

Bristol City Council's response to Inspectors' matters, issues and questions

Matter 13: Built Environment

This statement sets out the council's response to the Inspectors' matters, issues and questions regarding built environment matters.

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.

Suggested main modifications arising from the Inspectors' questions are set out in grey tint boxes.

Responses to Inspectors' questions

Issue 13.1: Whether policies DPM1, DC1-DC4, CHE1 and AD1 are justified, effective and consistent with national policy.

Design

Policy DPM1: Delivering well-designed, inclusive places

Q13.1: Is Policy DPM1 justified, consistent with national policy and effective? In particular:

a) Having regard to the Council's proposed main modification in their response to PQ 145 on the definition of major development, would the policy be effective? Are the proposed modifications necessary for soundness?

Council's response

1. Policy DPM1 reflects the content of section 12 of the NPPF which details how local planning authorities should address issues of design. The policy approach sets out an appropriate strategy for ensuring proper consideration of design matters as outlined in paragraph 130 of the NPPF (September 2023). The policy is also reflective of the content of the National Design Guide and National Model Design Code (consistent with NPPF September 2023, paragraph 134), and provides a policy context for a forthcoming Bristol Design Guide as required by paragraph 128 (NPPF September 2023). The policy frames national policy ambitions for good design within a Bristol context and sets out clear expectations for development that will be supplemented by the Bristol Design Guide when adopted.

2. The modifications proposed in response to PQ145 are considered necessary for the soundness of the policy. The modification referring to major development will ensure the policy is effective by defining the scale of development to which the policy's second paragraph applies. The removal of the references to beautiful development will ensure that the policy is effective by removing a consideration which is no longer contained within national planning policy.

Q13.1 b) Are the 10 characteristics of well-designed places consistent with each other and also other policies in the Plan?

Council's response

3. The ten characteristics of well-designed places are defined in the National Design Guide and the National Model Design Code and have been translated into policy DPM1 to reflect their role in national policy. They are consistent with each other and with other policies in the local plan, both which relate to design and other planning issues.

4. The sub-bullet points listed under the ten characteristics in policy DPM1: Delivering well-designed, inclusive places interact with other policies in the local plan and are intended to serve as general principles for well-designed development that should be considered in preparing proposals. They are considered consistent with other policies that reflect similar requirements or address similar issues. The principles set out under the ten characteristics section are not considered to be inconsistent with any other policies in the plan. A list of all policies in the local plan which interact with these principles and which are considered consistent with those principles is provided in Appendix 1.

Q13.1 c) Is the policy consistent with the NPPF where it relates to conserving and enhancing the historic environment?

Council's response

5. Policy DPM1 is intended to serve as an overarching policy to address design considerations across all forms of development. The policy is considered to be consistent with the NPPF where it relates to the historic environment, particularly as would operate in conjunction with policy CHE1, the policy specifically concerning the conservation and enhancement of the historic environment.

6. The policy relates to development more broadly than just that which interacts with the historic environment. It is intended to respond to the broader requirements of chapter 12 of the NPPF September 2023, relating to the design of development; whereas policy CHE1 is intended to respond to chapter 16 and the conservation of the historic environment. Development involving elements of the historic environment would be expected to respond to the requirements of policy CHE1 which is the primary policy for ensuring the conservation and enhancement of the historic environment.

Q13.1 d) Policy DPM1 sets out requirements in relation to co-ordinated development. Is the policy sufficiently clear and unambiguous, such that it would be clear to either decision makers or applicants what would be expected on an individual site?

Council's response

7. As noted in the council's response to PQ146, the term co-ordinated development is identical to wording of existing local plan policy DM27: Layout and form (DPD002) It is expected that the implementation of the policy would continue in the same way as now, with these matters generally addressed through the development management process, in particular through design and access statements.

8. For individual sites, applicants would be expected to demonstrate that they have considered issues relating to issues such as overshadowing or access throughout the design process. For larger, more complex areas of development where individual

sites might be coming forward at a similar time, such as in areas of growth and regeneration defined in the development strategy policies, applicants would be expected to demonstrate coordination with other developers and/or regard having been had to any existing masterplan or other spatial plan for the area.

Q13.1 e) In response to PQ147 the Council have suggested a main modification to clarify the thresholds that would apply to the requirements for provision of public art and cultural activity. Are the proposed modifications necessary for soundness? Subject to this, is the part of the policy relating to the threshold for public art and cultural activity justified and will it be effective?

Council's response

9. The modifications suggested in response to PQ147 are considered necessary for the soundness of the policy. As noted in response to PQ147, public art provision through local plan policy has been incorporated into the Bristol local plan since 1997. The current policy BCS21 'Quality Urban Design' Core Strategy (DPD001) has typically been secured through its incorporation into the design of development and has been implemented successfully. Public art provision as part of the design of new development is considered an appropriate design response for development that meets this threshold, helping promote distinctive and aesthetically positive development, according with the national design guide, in particular the characteristic 'identity'. The national design guide also notes under the characteristic 'public spaces' that the design of public spaces should support the integration of various elements, including public art.

Q13.1 f) In response to PQ145 the Council have also suggested a modification to Policy DPM1 where it refers to 'beautiful'. Is this proposed change necessary for soundness?

Council's response

10. The suggested modification to remove the word 'beautiful' is considered necessary to ensure the policy wording reflects national planning policy going forward. The removal of the references to beautiful development will ensure that the policy is effective by removing a consideration which is no longer contained within national planning policy.

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

National policy (footnote 49 of the NPPF) states that planning policies for housing may make use of the nationally described space standard where the need for an internal space standard can be justified.

Q13.2: Is Policy DC1 justified, consistent with national policy and effective? In particular:

a) Is the requirement in policy DC1 for residential development intended for permanent or long-term occupation to comply with nationally described space standards justified, taking account of need, viability and timing?

Council's response

11. The requirement in policy DC1 for residential development intended for permanent or long-term occupation to comply with nationally described space standards is considered justified. Bristol City Council has been applying the NDSS to residential development under policy BCS18 since October 2015. The council has explained the use of the NDSS in the [Government's Housing Standards Review: Operation of Bristol local Plan Policies – Update March 2021](#). Policy DC1 is consistent with this current approach as set out in policy and the council's [Space Standards Practice Note](#) (EXA034). The application of the NDSS since 2015 to a diverse range of dwelling sizes and types indicates that most residential development that has come forward in Bristol can comply with the NDSS without adverse impact on delivery or viability.

12. Additionally, an amendment was made to article 3 of the General Permitted Development Order (GPDO), which came into effect on 6th April 2021, which requires all new homes created through permitted development rights to have a minimum gross internal floor area of 37 square metres and to comply with the NDSS. The amendment, announced on 30 September 2020 (see '[Permitted development' homes to meet space standards](#)'), which acknowledged the need for permitted development homes to comply with the NDSS is considered equally applicable to all other homes delivered in Bristol. Moreover, the NDSS is widely applied by local planning authorities across England, emphasising the consensus that the standards are considered necessary to provide liveable, good quality dwellings.

13. The council's [Local Plan Viability Assessment](#) (EVEV01) makes the following assessment on the implications for viability of applying the NDSS, noting that the NDSS standards 'broadly align with the unit sizes typically delivered by developers and, where applied by other authorities elsewhere, have not had any demonstrable impact on scheme viability.'

14. The application of the NDSS under existing policy BCS18 since 2015 clearly indicates that the standards are already embedded, and developers are able to factor any potential cost of the NDSS into the economics of development.

Q13.2 b) Will the requirements relating to dual aspect homes and private outdoor space be effective and are they justified?

Council's response

15. Dual aspect dwellings are widely acknowledged to have numerous benefits, including increased ventilation, natural light and outlook. Planning policy requirements to maximise the provision of dual aspect and avoid single aspect dwellings are in place in other authorities such as in the London Plan (Policy D6: Housing quality and standards).

16. The policy relating to the provision of dual aspect dwellings is a continuation of current local plan policy DM29: Design of new buildings (DPD002).

17. The requirement in DC1 does not include a specific target for provision of dual aspect homes but expects that applicants will demonstrate efforts to maximise provision of dual aspect homes have been taken. In doing so, it embeds a degree of flexibility in the application of the policy, acknowledging that site constraints and other factors may result in the provision of some single aspect dwellings in some circumstances.

18. Regarding the provision of private outdoor space, current local plan policy DM27: Layout (DPD002) and form includes a similar requirement for development to 'enable the provision of adequate, appropriate and usable private or communal amenity space.' Private outdoor space is considered to have numerous benefits to health and wellbeing that justify its continued inclusion in policy. Since 2018, the council's Urban Living SPD (EXA020) has provided additional guidance as to the provision of private and communal open space and the application of the policy it details will continue to be applied under the new local plan. The requirements for open space under policy DC1 and the Urban Living SPD reflect requirements used elsewhere in the country, in particular the London Plan policy D6: Housing quality and standards. Given this approach has been applied in Bristol for some time, it is expected that the policy will continue to be effective and deliverable in its application going forward.

Q13.2 c) Will it be clear to the decision maker how they should react to proposals for specialist forms of accommodation as set out in paragraph 13.1.20? To be effective should this paragraph be included within Policy DC1?

Council's response

19. The response to PQ150 addressed this matter. As noted in the response, the council's [Space Standards Practice Note](#) (EXA034) sets out the approach to applying the nationally described space standard to residential development intended for permanent or long-term accommodation and other specialist forms of residential development. This practice note will be updated alongside the adoption of the new local plan, and the approach it outlines will continue to be used going forward.

20. The policy wording under the subheading 'internal space standards' states that the NDSS requirements would be applied to 'residential development intended for permanent or long-term occupation (generally those within use Class C3).' This is further explained in the explanatory text at paragraph 13.1.20 including reference to specialist forms of accommodation where a different approach to securing sufficient space would be applied. To provide further clarity on the approach to proposals for specialist forms of accommodation a suggested modification to the policy, which reflects the relevant wording set out at paragraph 13.1.20, has been added to the Schedule of Suggested Main Modifications. This is shown below:

Internal space standards

Residential development intended for permanent or long-term occupation (generally those within use Class C3) should provide sufficient space for everyday activities and to enable flexibility and adaptability by complying with the nationally described space standards.

Other specialist forms of residential development designed for short term occupancy or for specific occupier groups should provide suitable internal space to meet the needs of the intended occupiers. Guidance on the application of the nationally described space standard to these forms of residential development is set out in the council's Space Standards Practice Note.

Q13.2 d) Are the Council's proposed modifications relating to outdoor space as set out in their response to PQ.151 necessary for soundness?

Council's response

21. The proposed modifications relating to outdoor space as set out in the council's response to PQ151 are considered necessary for soundness. The modification is necessary to ensure clarity that it is referring explicitly to outdoor space, rather than open space, which for the purposes of the local plan has an alternative meaning under policy GI A 'Open space for recreation.'

Policy DC2: Tall Buildings

Q13.3: Is Policy DC2 justified, consistent with national policy and effective? In particular:

a) Is the policy consistent with the NPPF at paragraph 126 in relation to achieving high quality beautiful and sustainable buildings, and paragraph 130 (a-e) in relation to planning policies and decisions?

Council's response

22. Paragraph 126 of the NPPF (September 2023) notes the importance that local planning authorities be clear about design expectations and how these will be tested in ensuring high quality, beautiful and sustainable buildings and places are delivered.

23. The policy sets out expectations for tall buildings in the form of design considerations such as being visually attractive, having regard to views and their cumulative impact in a given area, as well as their need to demonstrate compliance with other design policies and the council's Urban Living SPD and future design guides and codes which will provide additional detailed guidance on design. It also sets out specific harmful impacts that proposals for tall buildings will be expected to demonstrate they would not cause.

24. This approach is considered appropriate to meet the requirements of paragraph 126 of the NPPF. The NPPF notes that plans should 'at the most appropriate level, set out a clear design vision and expectation' (NPPF September 2023, paragraph 127). It also notes that 'to provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code' (NPPF September 2023, paragraph 128). The approach in policy DC2 is reflective of this. Given the local plan is the highest level of local planning policy in the authority area, it would not be appropriate for it to include detailed design considerations that the NPPF suggests are best outlined in design guide and codes. The approach to design set out in the local plan is reflective of this, providing a core policy framework off which the Bristol Design Guide will be produced to accompany the new local plan.

25. The policy is also considered consistent with paragraph 130 a-e of the NPPF (September 2023). The design considerations detailed above; the specific harmful impacts it notes tall buildings should avoid and the additional guidance both extant and future that are outlined enable the effective application of the policy.

Q13.3 b) Is the policy justified having regard to any evidence produced in support of the policy, and is this evidence up to date? Is the definition of tall buildings set out in paragraph 3.1.26 justified and will it be effective?

Council's response

26. Tall buildings for residential and commercial use have been a feature of development in the city since the mid twentieth century with examples particularly located in the centre as well as residential blocks in other areas. The tallest residential building in the city at Castle Park View (26 storeys) recently added to the examples of tall buildings in Bristol city centre and there are further tall buildings under construction or with planning permission. Development of tall building was guided by a tall buildings SPD from 2005 and then by the Urban Living SPD of 2018 which was published with an evidence base that makes reference, amongst other things, to tall buildings.

27. Paragraph 13.1.23 notes the beneficial aspects of tall buildings and paragraph 13.1.27 indicates the policy does not aim to conceal tall buildings from view but to ensure that they are located and designed to create a positive feature in the urban environment. Paragraph 13.1.25 refers to particular issues related to height, massing and prominence.

28. The policy sets out an appropriate approach to the consideration of further proposals for tall buildings that takes account of specific considerations relating to their siting and potential impact. The policy links with policy UL1: Effective and efficient use of land which provides additional information relating to the siting of more intensive forms of development, including tall buildings. The provisions in both policies are intended to ensure that tall buildings are located in appropriate areas, generally proximate to the city centre and certain areas of growth and regeneration, as well as public transport.

29. The council has also produced specific guidance for some areas of growth and regeneration where tall buildings are expected to be appropriate. These frameworks look in greater detail at tall buildings. Some examples include the Frome Gateway Spatial Regeneration Framework, the City Centre Framework and City Centre Development and Delivery Plan and the Temple Quarter Spatial Framework.

30. The provisions of the policy apply to buildings of the height referred to. Buildings that are taller than their surroundings but not greater than 30 metres/10 storeys would be addressed through the application of other design policies, particularly DPM1. This policy requires consideration of a proposal's impact on its context and all other relevant design considerations. Policy DPM1 recognises that development proposals that introduce new types of design, scale and form (which would include increased heights), may be appropriate subject to consideration of the local character.

Q13.3 c) The policy allows for tall buildings in the Inner Urban Area, Bristol City Centre, Temple Quarter and St Philip's Marsh or as identified in policies for specific regeneration areas, and not elsewhere within the City area? Is this approach justified?

Council's response

31. The areas identified in the first paragraph of the policy wording have been identified due to their suitability for tall buildings. They are proximate to the city centre and its associated infrastructure and services, in particular public transport, and as such are suitable for more intensive forms of development such as tall buildings. Tall buildings or other forms of more intensive development in areas not

served by this infrastructure and services are less likely to be appropriate and could contribute to negative outcomes such as unsustainable transport patterns that the council seeks to avoid.

32. The policy indicates where tall buildings may be appropriate. The approach in the policy does not specifically preclude the possibility of tall buildings being located in areas beyond those identified in the first paragraph; however, any proposals would be assessed against the policy's provisions and locational considerations would be a significant issue to be taken into account.

Q13.3 d) Will it be clear to the decision maker how they should react to proposals for tall buildings brought forward under Policy DC2 particularly with regard to bullets (i) to (iv) in the second paragraph of the policy, and the fourth paragraph relating to being accompanied by sufficient information?

Council's response

33. As noted in response to PQ153, the policy's explanation text states that Landscape and Visual Impact Assessments (discussed further in response to PQ155 and with an accompanying modification for clarity) will be necessary where a planning application is submitted for a tall building as defined in the policy (over 10 storeys or more than 30 metres in height). The impacts of the proposal on local micro-climate should be detailed as part of the scheme's design and access statement.

34. The council's Urban Living SPD provides detailed information relating to the design of tall buildings, as well as compliance information to be used by applicants in their submissions. The Urban Living SPD provides a tool for assessing applications that will be updated to accompany the new local plan upon adoption and will continue to be used in this capacity. The Bristol Design Guide, once adopted, will also provide additional information to help assess the appropriateness of all development proposals, including tall buildings.

35. Regarding sufficient information required to assess their potential impacts, applicants would be expected to provide documents as detailed in the council's Local list of Planning Application Requirements. This list will be updated upon adoption of the new local plan to reflect any changes required by new policies and will outline what information is expected with regard to tall buildings.

Q13.3 e) In response to PQ155 the Council have suggested a modification to Policy DPM1 where it refers to Landscape and Visual Impact Assessments. Is this proposed change necessary for soundness. Is the requirement to produce a Landscape and Visual Impact Assessment as part of a planning application for a tall building justified?

Council's response

36. The modifications proposed in response to PQ155 are considered necessary for the soundness of the policy.

37. The requirement for Landscape and Visual Impact Assessments for tall building proposals is considered to be justified. The requirement is an extant requirement of policy DM26: Local character and distinctiveness. Tall buildings, by virtue of their scale, have the potential to impact on the landscape and character of a wide area.

The NPPF notes that planning policies and decisions should ensure that developments are 'sympathetic to local character and historic, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities) (NPPF September 2023, paragraph 130, c). Requiring Landscape and Visual Impact Assessments is considered a reasonable and appropriate means of ensuring these issues are properly addressed in the design stage and can be properly assessed through the development management process.

Q13.3 f) Is the policy consistent with other policies in the plan, including relevant DS policies and Policy CHE1?

Council's response

38. The policy is consistent with other policies in the plan, including relevant development strategy policies, and policy CHE1. The policy is consistent with the expectations set out in the plan's various development strategy policies, other design policies such as DPM1 and DC1. Many of the DS policies specifically reference tall buildings and provide additional context to policy DC2, typically within the 'place principles' sections of these policies. It is noted that policy DS3: St Philip's Marsh does not make reference to tall buildings and where they might be appropriate. Tall buildings have already been permitted in this area, and proposals for them may come forward in the lifetime of the plan. As such, a modification to the 'place principles' section is proposed to ensure consistency in approach. The modification, located in the first bullet point under 'Place principles' is as follows:

Development will have a form, scale and density consistent with its central urban location. Tall buildings of an appropriate design and setting may be appropriate as part of the development mix in accordance with Policy DC2 'Tall buildings'.

39. With regard to policy CHE1, the policy's provisions do not conflict with its content. The policy does not address heritage concerns directly, as where a proposal for a tall building would or could have an impact on a heritage asset, it would be expected to demonstrate compliance with the provisions of policy CHE1.

40. The policy also works in conjunction with policy UL1 and UL2, which are intended to help ensure the effective and efficient use of land. These policies together seek to direct more intensive development to suitable locations, namely those proximate to the city centre, appropriate areas of growth and regeneration and necessary amenities and services such as public transport links.

Policy DC3: Alterations to existing buildings

The policy, amongst other matters, seeks to ensure developments, amongst other matters, respect the original building, its curtilage, and the street; retain and/or reinstate traditional or distinctive architectural features; and safeguard amenity.

Q13.4: Is policy DC3 justified, consistent with national policy and effective? In particular:

a) Are these requirements, which may be wide ranging in some instances proportionate to the effects of all relevant development and does it represent a justified strategy?

Council's response

41. Bullet points i-iv and the requirement that extensions are physically and visually subservient to the host building, are currently included in existing local plan policy DM30: Alterations to existing buildings (DPD002). The policy requirements are considered appropriate, aimed at ensuring alterations and extensions are not incongruous with the existing building or have an adverse impact on their surroundings. This is consistent with the requirements of section 12 of the NPPF (September 2023) which seek to promote well-designed development. Reasoning for the application of each of the requirements is outlined below:

- i. Respect the siting, scale, form, proportions, materials, details and the overall design and character of the host building, its curtilage and the broader street scene.

This is intended to ensure that extensions or alterations to an existing building are not of a form or style that is incongruous with its surroundings, having undue impact on surrounding properties and the general visual quality of the area.

Similar requirements are in place in other local authorities such as Kensington and Chelsea (see policy CD13: Existing buildings – Extensions and modifications, in Appendix 2); Barking and Dagenham (see policy DMD 5: Householder extensions and alterations, in Appendix 2); Liverpool (see policy UD7: Alterations and extensions to existing buildings, in Appendix 2); and Merton (see policy D12.4 Alterations and extensions to existing buildings, in Appendix 2).

- ii. Retain and/or reinstate traditional or distinctive architectural features and fabric.

This is intended to ensure that the design of alterations and extensions is visually in keeping and not incongruous with the host building.

Similar requirements are in place in other local authorities such as Westminster (see policy 40: Townscape and architecture, in Appendix 2) and Kensington and Chelsea (see policy CD13: Existing buildings – extensions and modifications, in Appendix 2).

- iii. Safeguard the amenity of the host premises and neighbouring occupiers.

This is intended to ensure that alterations or extensions to an existing building would not cause negative impacts on both occupants of the building and neighbouring properties.

Similar requirements are in place in other local authorities such as Barking and Dagenham (see policy DMD 5: Householder extensions and alterations, in Appendix 2); Wakefield (see policy LP57, in Appendix 2); and Liverpool (see policy UD7: Alterations and extensions to existing buildings, in Appendix 2).

- iv. Leave sufficient usable external private space for the occupiers of the building.

This is intended to ensure that occupants of a dwelling have access to sufficient external outdoor space which is considered desirable for the wellbeing of occupants.

Similar requirements are in place in other local authorities such as Liverpool (see policy UD7 Alterations and extensions to existing buildings, in Appendix 2 – whilst not referring specifically to external private space, the policy states alterations and extensions to existing buildings should ensure 'adequate amenity space is retained for the occupiers of the building) and Mansfield (see policy P6: Home extensions and alterations, in Appendix 2).

42. The requirement in policy for extensions to be physically and visually subservient to the host building, and not to dominate by virtue of their siting or scale is intended to ensure the overall quality of design of the proposal, and to ensure that it is not incongruous to its surrounding and the wider streetscape.

43. Similar requirements are in place in other local authorities such as Kensington and Chelsea (see policy CD13: Existing buildings – Extensions and modifications, in Appendix 2); Barking and Dagenham (see policy DMD 5: Householder extensions and alterations, in Appendix 2); and Merton (see policy D12.4 Alterations and extensions to existing buildings, in Appendix 2).

Q13.4 b) The also states that extensions and alterations to existing buildings should leave 'sufficient usable external private space' for future occupiers. On what basis would the Council determine the adequacy of such space and is the policy clear and unambiguous in this regard?

Council's response

44. The requirement for alterations to leave 'sufficient useable external private space' for future occupiers is currently included in existing local plan policy DM30: Alterations to existing buildings (DPD002).

45. The policy would work alongside policy DC1 which sets out the council's approach to ensuring provision of adequate private outdoor space. Policy DC1 sets out that development should ensure sufficient provision of safe and usable private amenity and play space. The Urban Living SPD defines this as for a 1-2 person dwelling, providing approximately 5 m², with an additional 1 m² per additional occupant.

Q13.4 c) The Reasoned Justification refers to the Supplementary Planning Document No.2 'A Guide for Designing House Alterations and Extensions' and Policy Advice Note 8 'Shopfront Guidelines'. What status do these documents have, and is it appropriate to refer to documents not included in the Plan?

Council's response

46. Supplementary Planning Document no.2 'A guide for Designing House Alterations and extensions' is an adopted supplementary planning document. The document was adopted in 2005. It provides detailed guidance on the design of householder alterations and extensions and is used in assessing the acceptability of such proposals. It is referenced in the current local plan under policy BCS 21: Quality urban design (DPD001) and policy DM30: Alterations to existing buildings (DPD002). The guidance remains extant and reference to it in policy DC3 is considered appropriate. The council intends to update the SPD following adoption of the new

local plan; however, given the specific nature of its contents, it is expected that much of it will remain unchanged.

47. Policy Advice Note 8 'Shopfront Guidelines' remains extant and reference to it in policy DC3 is considered appropriate. The guidance is referenced in extant local plan policies BCS 21: Quality urban design; BCS22: Conservation and the historic environment (DPD001) and policy DM31: Heritage Assets (DPD002). The council intends to update the guidance following adoption of the new local plan as part of the new Bristol Design Guide.

Q13.4 d) Paragraph 13.1.39 of the Reasoned Justification refers to proposals for signage. As advertisements fall outside of the requirement for planning permission (given that they are controlled under the Advertisement Regulations¹), is it appropriate for this to be referenced?

Council's response

48. The reference to the shopfronts guidance and signage in particular is for information purposes. It directs applicants to guidance the council has prepared regarding appropriate design of shopfronts, including signage. This reference is considered appropriate and does affect any specific requirements on advertisement consents which are governed under the Advertisement Regulations.

Policy DC4: Recycling and refuse provision in new development

Policy DC4 states that developments should be in accordance with the 'Waste and Recycling Storage and Collection Facilities Guidance for Developers', which will be updated.

Q13.5: Given that there is the potential for the standards for the delivery of such facilities to change over time, is this policy consistent with a plan led approach?

Council's response

49. The provisions relating to current standards issued by the city's waste and recycling provider are considered appropriate because the technicalities of the collection regime may be subject to change over the plan period. This is consistent with a plan led approach as it will best ensure future development properly reflects the needs of users and the service provider. It would not be appropriate the local plan to freeze matters such as the dimensions of bins which are referred to in paragraph 13.1.43. This could lead to development which did not accommodate the most up to date forms of recycling and refuse storage and equipment.

Policy CHE1: Conservation and the historic environment

Paragraph 189 of the NPPF indicates that there are a range of heritage assets and refers to that these should be conserved in a manner appropriate to their significance. Paragraph 190 of the NPPF sets out that plans should set out a positive strategy for the conservation and enjoyment of the historic

¹ Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended)

environment and sets out several factors to be taken into account in the strategy.

Q13.6: Is Policy CHE1 justified, effective and consistent with national policy?

In particular:

a) Is the policy consistent with the NPPF and legal requirements relating to the historic environment where necessary, in respect of each part of the policy? Is the policy consistent with paragraph 202 of the NPPF in relation to the assessment of where less than substantial harm should be weighed against public benefits?

Council's response

50. The policy is largely a reflection of current local plan policies BCS22: Conservation and the historic environment and DM31: Heritage assets (DPD002). The policy as a whole reflects the requirements of section 16 of the NPPF, providing a framework for protecting and enhancing heritage assets whilst also acknowledging that changes and alterations to such assets may be required to facilitate their continued use, adaptability to the future and the wider public interest.

51. The NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected by development proposals, including any contribution made by their setting (NPPF September 2023, paragraph 194). The policy's 'general principles' section and its associated sub-sections sets this out and describes various types of historic asset that are present in Bristol that require specific consideration relative to their historical significance.

52. The policy also requires development proposals that would affect heritage assets to demonstrate a clear understanding of the asset in the 'understanding the asset' section.

53. The NPPF also requires that planning authorities consider the:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness

54. The policy's 'conserving heritage assets' section reflects these requirements of the NPPF. It recognises the importance of retaining historic assets by expecting developers to demonstrate that all reasonable efforts have been made to sustain the existing use, find new ones, or mitigate the extent of harm to the asset. It also requires that developers demonstrate that works conducted are to a minimum level required to secure the long-term use of a given asset; how those features of a heritage asset that contribute to its specific value are retained; and how local character would be respected. These requirements also reflect paragraph 202 of the NPPF, permitting less than substantial harm to an asset where it is clearly demonstrated that such change is required as per the policy's tests. Whilst the term 'less than substantial harm' is not directly used the tests are still reflective of the NPPF's requirements in this regard.

55. The 'recording the asset' section of the policy is reflective of paragraph 205 of the NPPF which requires local planning authorities to ensure developers record and

advance the understanding of the significance of any heritage assets to be lost (wholly or in part). This section also acknowledges that harm to a historic building may be permitted some instances, reflecting paragraph 202.

56. The policy's 'energy efficiency retrofit, sustainable heating and renewable energy systems' section is also reflective of paragraph 202. It is considered that securing the sustainability and by extension, continued usability of historic assets is key to their continued optimum viable use and wider public benefits.

57. It is expected that policy will function in conjunction with the NPPF and PPG; however, a modification to the policy may be necessary to fully address the issue of public benefits outlined in paragraph 202 of the NPPF and the government's Historic Environment guidance in the PPG:

58. In policy CHE1: Conserving and the historic environment' – policy wording, between sub-sections 'general principles' and 'understanding the asset' insert a new sub-section:

Public benefits

Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against public benefits. Examples of public benefits may include:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.
- Reducing or removing risks to a heritage asset.
- Securing the optimum viable use of a heritage asset in support of its long-term conservation.

59. Heritage at Risk Register and Bristol's heritage strategy

60. In response to concerns raised by Historic England, the council proposes a modification to the explanation section of policy CHE1 to make specific reference to the importance of assets on the Heritage at Risk Register:

61. In explanation text under subsection 'Heritage Assets' insert a new paragraph between 13.2.8 and 13.2.9:

'In assessing applications involving heritage assets on the Heritage at Risk Register, positive regard will be had to the potential for proposals to reduce risk to any affected assets.'

62. A modification is also proposed to enhance the reference to Our Inherited City in response to concerns raised by Historic England:

63. In explanation text under subsection 'Bristol's heritage record' insert new wording to paragraph 13.2.14:

'In addition to these resources, the council has produced Our Inherited City, a strategy for managing Bristol's heritage. This strategy sets out priorities for the city's historic environment with a focus on city and neighbourhood identities, consistent with the National Design Guide and National Model Design Code. The council intends to update this strategy in 2025. Applicants should refer to the Our Inherited City Heritage Statement Guidance (2020). This guidance has been prepared to assist developers, planners and other stakeholders engaged in projects that have the potential to impact the historic environment. Details of listed buildings, both nationally and locally, can be found on the council's website. This guidance has been

prepared to assist developers, planners and other stakeholders engaged in projects that have the potential to impact the historic environment. Details of listed buildings, both nationally and locally, can be found on the council's website.'

Q13.6 b) Is the policy clear and unambiguous about how the decision maker should react to development involving i) archaeology, ii) listed buildings; iii) conservation areas, iv) Registered historic parks and gardens and v) locally important heritage assets as well as vi) Buildings at Risk?

Council's response

64. The policy requirements are included in existing local plan policy DM31: Heritage assets (DPD002). Given the range and variety of historical assets within these types, and the need to assess any impact on an asset on the basis of the asset's specific characteristics, value and interest, it is not possible for the policy to outline this in exhaustive detail. Instead, it establishes a broad requirement to be assessed for each type of historic asset.

65. Buildings at Risk are not specifically addressed in the policy. As noted in the council's response to PQ156, the Heritage at Risk Register catalogues designated heritage assets that have been assessed by Historic England as at risk. Policy CHE1 sets out an approach to conserving all heritage assets, with specific reference to listed buildings, scheduled monuments, conservation areas, archaeology, and historic parks and gardens. The policy would necessarily apply proposals affecting buildings on the register and require consideration of their specific conditions and significance. Additionally, the suggested modification to the policy outlined in response to Q13.6 a would further ensure that risk and the potential to mitigate it is properly addressed through decision making.

66. The policy is also clear in its other requirements, outlining how proposals that would affect a heritage asset should respond to it for all types of asset, such as the need to record the understand, conserve and record a given asset.

67. For reference, an appendix (3) has been added to these statements has been listing assets of the Heritage at Risk Register. At present there are 14 in the city. One is located within the Western Harbour development strategy policy area (Brunel's Swing Bridge). St Mary Le Port church is within Policy DS1A area and has been considered within the planning permission for the wider St Mary Le Port site. The other at risk assets are located outside regeneration areas (DS2-14) and site allocations.

Q13.6 d) Are the Council's proposed modifications set out in their response to PQ157 in respect of heritage statements necessary for soundness?

Council's response

68. The modifications suggested in response to PQ157 in respect of heritage statements are required to ensure the policy is effective and therefore sound. The current policy wording is ambiguous as to when a heritage statement will be required, and the amended wording makes it clearer that such statements will only be required to accompany applications likely to impact heritage assets.

Q13.6 e) Is the Council's proposed modification set out in their response to PQ159 in respect of PPS5 necessary for soundness?

Council's response

69. The modifications suggested in response to PQ159 are considered necessary to ensure the policy is sound.

Policy AD1: Advertisements

The NPPF requires that applications for advertisement consent be determined based on public safety and amenity.

Q13.7: Are all elements of the policy, in respect of amenity, consistent with Paragraph 136 of the NPPF?

Council's response

70. The elements outlined in policy AD1: Advertisements in respect of amenity are considered to be consistent with paragraph 136 of the NPPF. The paragraph does not elaborate on what constitutes amenity; the considerations listed are considered relevant amenity considerations and appropriate within the context of paragraph 136.

Appendix 1: Ten characteristics policy interaction

The list below has been prepared to show where the sub-bullet points listed under the ten characteristics in policy DPM1: Delivering well-designed, inclusive places interact with other policies in the local plan. The sub-bullets are intended to serve as general principles for well-designed development that should be considered in preparing proposals. They are considered consistent with other policies that reflect similar requirements or address similar issues as outlined below. The principles set out under the ten characteristics section are not considered to be inconsistent with any other policies in the plan.

Nature – enhanced and optimised.

- Retain and integrate existing blue/green infrastructure in and around the site. **Consistent with:**
 - BG1: Green infrastructure and biodiversity in new development.
 - BG4: Trees.
 - Various Development Strategy policies which specifically address existing blue/green infrastructure assets. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of existing blue/green infrastructure in the area.
 - Various site allocations outline considerations relevant to these principles.
- Provide complementary and multi-functional blue/green infrastructure and integrated landscape design. **Consistent with:**
 - BG1: Green infrastructure and biodiversity in new development.
 - BG4: Trees.
 - BG5: Biodiversity and access to Bristol's waterways.
 - NZC4: Adaptation to a changing climate.
 - HW2: Air quality.
 - Various Development Strategy policies which specifically address existing blue/green infrastructure assets. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of existing blue/green infrastructure in the area.
 - Various site allocations outline considerations relevant to these principles.

Movement – accessible and easy to move around.

- Create legible, permeable and inter-connected public realm. **Consistent with:**
 - Various Development Strategy policies which make references to enhanced and improved public realm and connectivity and/or specific areas of public realm or movement routes. Additionally, many DS policies set out that relevant masterplans or strategies for the areas

should be followed. These master plans provide assessment of movement routes through the area.

- SSE2: Development in Bristol's centres.
- Various site allocations outline considerations relevant to these principles.
- Promote active travel by delivering multi-modal streets that reduce the role of the car and support walking, cycling and public transport provision.
Consistent with:
 - BG1: Green infrastructure and biodiversity in new development.
 - BG5: Biodiversity and access to Bristol's waterways.
 - BG7: The St Paul's green link.
 - GI A: Open space for recreation.
 - Various Development Strategy policies which make reference to specific transport and movement corridors and their integration with the area of growth and regeneration. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of movement routes through the area.
 - T1: Development and transport principles.
 - T3A: Transport development management.
 - T6: Active travel routes.
 - NZC4: Adaptation to a changing climate.
 - Various site allocations outline considerations relevant to these principles.
- Incorporate blue/green infrastructure along movement corridors. **Consistent with:**
 - Various Development Strategy policies which make specific reference to enhancing existing routes and movement corridors, including improvements and incorporation of existing blue/green infrastructure. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of existing green/blue infrastructure assets.
 - BG4: Trees.
 - BG5: Biodiversity and access to Bristol's waterways.
 - BG7: The St Paul's green link.
 - GI A: Open space for recreation.
 - Various site allocations outline considerations relevant to these principles.

Context – enhances the surroundings.

- Demonstrate an understanding and respect for an area's unique built, natural and cultural characteristics. **Consistent with:**

- Various Development Strategy policies which set out requirements for development to respond to the area's existing context, including in places specific natural, built or cultural features. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of existing context, identity and community.
- UL1: Effective and efficient use of land.
- UL2: Residential densities.
- H7: Managing the development of purpose-built student accommodation.
- SSE2: Development in Bristol's centres.
- NZC4: Adaptation to a changing climate.
- CHE1: Conservation and the historic environment.
- Various site allocations outline considerations relevant to these principles (historic/natural assets).
- Integrate and reuse existing natural and built assets of value. Integrate and contribute positively to the site's context. Consistent with:
 - BG1: Green infrastructure and biodiversity in new development.
 - BG2: Nature conservation and recovery.
 - BG4: Trees.
 - BG5: Biodiversity and access to Bristol's waterways.
 - CHE1: Conservation and the historic environment.
 - Various Development strategy policies which set out requirements to respond to historic and/or natural features of value either generically or with specific reference to certain assets. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of existing context, identity and community.
 - FS3: The protection of existing food growing enterprises and allotments.
 - Various site allocations outline considerations relevant to these principles (historic/natural assets).

Identity – attractive and distinctive.

- Enhance, or where appropriate create, distinct identity of place reflecting its past, present, and future. Consistent with:
 - Various Development Strategy policies that set out how development should respond to elements of the area's existing context and/or specific characteristics. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of existing context, identity and community.
 - UL1: Effective and efficient use of land.

- UL2: Residential densities.
- H7: Managing the development of purpose-built student accommodation.
- SSE2: Development in Bristol's centres.
- NZC4: Adaptation to a changing climate.
- CHE1: Conservation and the historic environment.
- Various site allocations outline considerations relevant to these principles (historic/natural assets).
- **Support a sense of community pride, belonging and cohesion. Consistent with:**
 - Various Development Strategy policies that set out how development should respond to elements of the area's existing context and/or specific characteristics, enhancing and/or creating new communities with distinctive identity. In doing so, development will be better able to foster community pride and cohesion.
 - GI A: Open space for recreation.
 - GI3: Incidental open spaces.
 - Chapter 13 Design and conservation is intended to promote well-designed development both in terms of the quality of spaces it provides to residents and users, as well as visual quality.
 - Various site allocations outline considerations relevant to these principles (historic/natural assets).
- **Create visually attractive buildings and spaces. Consistent with:**
 - Chapter 13 Design and conservation. The wider policy suite is intended to ensure visually attractive development. The Bristol Design Guide will further outline design considerations necessary to achieve this.
 - NZC4: Adaptation to a changing climate
 - GI A: Open space for recreation.
 - GI3: Incidental open spaces.
 - UM1: Telecommunications.

Built form – a coherent pattern of development.

- **Deliver contextually appropriate balance between buildings, spaces, and liveability considerations. Consistent with:**
 - Various Development Strategy policies that set out how development should support delivery of a balance between buildings, spaces and uses.
 - UL1: Effective and efficient use of land.
 - UL2: Residential densities.
 - Various site allocations outline considerations relevant to these principles (site specific considerations).

- Enhance placemaking through the legible organisation of streets, spaces and buildings. Consistent with:
 - Various Development Strategy policies which make references to enhanced and improved public realm and connectivity and/or specific areas of public realm or movement routes. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of movement routes through the area.
 - SSE2: Development in Bristol's centres.
 - Chapter 13 Design and conservation. The wider policy suite is intended to ensure the legibility of streets and spaces created by development. The Bristol Design Guide will further outline design considerations necessary to achieve this.
 - Various site allocations outline considerations relevant to these principles (site specific considerations).
- Deliver an integrated, efficient and secure built form that clearly defines public and private space. Create active frontages that address the public realm. Ensure appropriate relationship with the building edge and a suitable transition between the spaces. Consistent with:
 - Various Development Strategy policies that set out how development should support delivery of an integrated, efficient and secure built form with specific references to site specific considerations. Some DS policies specifically refer to active frontages/ground floor uses.
 - Chapter 13 Design and conservation. The wider policy suite is intended to ensure good design, including public realm and establish appropriate relationships between building edges and the transition between spaces. Policies such as DC1 specifically address provision of private outdoor space. The Bristol Design Guide will further outline design considerations necessary to achieve this.
 - H8: Older people's and other specialised needs housing.
 - GI A: Open space for recreation.
 - H7: Managing the development of purpose-built student accommodation.
 - BG5: Biodiversity and access to Bristol's waterways.
 - SSE1: Supporting Bristol's Centres – network and hierarchy.
 - Various site allocations outline considerations relevant to these principles (site specific considerations).

Public and communal spaces – safe, social and inclusive.

- Deliver well-designed public and communal spaces that support interaction, wellbeing, relaxation, and recreation. Consistent with:
 - Chapter 13 Design and conservation. The wider policy suite is intended to ensure good design, including the provision of public and communal spaces that support interaction, wellbeing, relaxation and recreation. Policy DC1 specifically address provision of private and communal

outdoor space. The Bristol Design Guide will further outline design considerations necessary to achieve this.

- FS2: Provision of food growing space in new developments.
- H8: Older people's and other specialised needs housing.
- GI A: Open space for recreation.
- Various site allocations outline considerations relevant to these principles (provision of public realm, community infrastructure, leisure uses and public spaces).
- Various Development Strategy policies that set out how development should support delivery of things such as community facilities, public realm, retail, sport and leisure uses.
- **Create safe, secure, and attractive settings for the spaces. Consistent with:**
 - DS1A: Bristol City Centre – Broadmead, Castle Park and the Old City.
 - GI A: Open space for recreation.
 - T1: Development and transport principles.
 - T3A: Transport development management.
 - FR1: Flood risk and water management.
 - FR2: Bristol Avon Flood Strategy.
 - FS2: Provision of food growing space in new developments.
 - Various site allocations outline considerations relating to safety, in particular flood risk and public rights of way.
- **Incorporate blue/green infrastructure. Consistent with:**
 - BG1: Green infrastructure and biodiversity in new development.
 - BG4: Trees.
 - BG5: Biodiversity and access to Bristol's waterways.
 - NZC4: Adaptation to a changing climate.
 - HW2: Air quality.
 - Various Development Strategy policies which specifically address existing blue/green infrastructure assets. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed. These master plans provide assessment of existing blue/green infrastructure in the area.
 - Various site allocations outline considerations relevant to these principles.

Uses – mixed and integrated.

- **Major development proposals should provide or contribute to an appropriate mix of uses and facilities. Consistent with:**
 - Various Development Strategy policies which specifically address provision of mixed-use development. Additionally, many DS policies set

out that relevant masterplans or strategies for the areas should be followed which address uses.

- UL1: Effective and efficient use of land.
 - UL2: Residential densities.
 - H7: Managing the development of purpose-built student accommodation.
 - E3: Location of office development.
 - E6A: New workspace within mixed use development.
 - E6: Affordable workspace
 - CF1: Provision of community facilities
 - Various site allocations outline mixed-use development should be provided.
- Promote a diverse mix of compatible uses, building types, unit sizes and tenures. Consistent with:
 - Various Development Strategy policies which specifically address provision of mixed-use development. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed which address uses.
 - UL1: Effective and efficient use of land.
 - UL2: Residential densities.
 - H7: Managing the development of purpose-built student accommodation.
 - E3: Location of office development.
 - E6A: New workspace within mixed use development.
 - E6: Affordable workspace.
 - CF1: Provision of community facilities.
 - Various site allocations outline mixed-use development should be provided.
 - AH1: Affordable housing provision.
 - H4: Housing type and mix.

Homes and buildings – Liveable, functional, healthy and sustainable.

- Deliver liveable buildings with healthy/quality indoor and outdoor living environment. Consistent with:
 - UL1: Effective and efficient use of land.
 - UL2: Residential densities.
 - AH1: Affordable housing provision.
 - H6: Houses in multiple occupation and other shared housing.
 - H7: Managing the development of purpose-built student accommodation.

- H8: Older people's and other specialised needs housing.
- H9: Accessible homes.
- BG6: Private gardens.
- NZC4: Adaptation to a changing climate.
- Chapter 13 Design and conservation. The wider policy suite is intended to ensure good design, including the provision of liveable buildings with healthy/quality indoor and outdoor living environments. Policy DC1 specifically address issues relating to liveability including space standards for both indoor and outdoor areas. The Bristol Design Guide will further outline design considerations necessary to achieve this.
- Provide adequate natural lighting, ventilation, accessibility, privacy, outlook, and amenity arrangements. Consistent with:
 - H6: Houses in multiple occupation and other shared housing.
 - H7: Managing the development of purpose-built student accommodation.
 - H8: Older people's and other specialised needs housing.
 - Chapter 13 Design and conservation. The wider policy suite is intended to ensure good design, including the provision of liveable buildings designed with regard to natural light, ventilation, accessibility, privacy, outlook and amenity arrangements. The Bristol Design Guide will further outline design considerations necessary to achieve this.
- Provide integrated storage and servicing provisions. Consistent with:
 - H6: Houses in multiple occupation and other shared housing.
 - H7: Managing the development of purpose-built student accommodation.
 - H8: Older people's and other specialised needs housing.
 - H10: Planning for traveller sites.
 - T4A: Parking, servicing and the provision of infrastructure for electric vehicles.
 - Chapter 13 Design and conservation. The wider policy suite is intended to ensure good design, including the provision of integrated storage and servicing needs. Policy DC4 in particular outlines requirements to provide adequate waste and refuse storage. The Bristol Design Guide will further outline design considerations necessary to achieve this.

Resources – efficient and resilient.

- Efficient use of land, energy and water through design, construction and management of buildings. Consistent with:
 - UL1: Effective and efficient use of land.
 - UL2: Residential densities.
 - NZC1: Climate change, sustainable design and construction.
 - NZC2: Net zero carbon development – operational carbon.

- NZC3: Embodied carbon, materials and circular economy.
- NZC4: Adaptation to a changing climate.
- Various Development Strategy policies which specifically address the efficient use of land. Additionally, many DS policies set out that relevant masterplans or strategies for the areas should be followed which address the efficient use of resources, in particular land.
- Various site allocations outline where a development would constitute an efficient use of land.
- H4: Housing type and mix.
- E2: Economic development land strategy.
- E4: Avonmouth Industrial Area and Bristol Port.
- E5: Industry and Distribution Areas.
- BG6: Private gardens.
- T4A: Parking, servicing and the provision of infrastructure for electric vehicles.
- Chapter 13 Design and conservation. The wider policy suite is intended to ensure good design, including energy, resource and land use efficiency. The Bristol Design Guide will further outline design considerations necessary to achieve this.

Lifespan – made to last.

- Design robust and adaptable buildings and spaces. Consistent with:
 - DS5: Frome Gateway.
 - H6: Houses in multiple occupation and other shared housing.
 - H7: Managing the development of purpose-built student accommodation.
 - H8: Older people's and other specialised needs housing.
 - H9: Accessible homes.
 - CF1: Provision of community facilities.
 - Chapter 13 Design and conservation. The wider policy suite is intended to ensure good design, including adaptability and robustness overtime. The Bristol Design Guide will further outline design considerations necessary to achieve this.
 - NZC1: Climate change, sustainable design and construction.
 - NZC2: Net zero carbon development – operational carbon.
 - NZC3: Embodied carbon, materials and circular economy.
 - NZC4: Adaptation to a changing climate.
- Maintaining high quality and design integrity through design and development stages. Consistent with:
 - T4A: Parking, servicing and the provision of infrastructure for electric vehicles.

- NZC1: Climate change, sustainable design and construction.
- NZC4: Adaptation to a changing climate.
- HW2B: Health and development.
- Various Development Strategy policies set out that relevant masterplans or strategies for the areas should be followed which will aid in coherent design not only of individual developments, but across the wider area of growth and regeneration.
- **Enable long term stewardship of buildings and spaces. Consistent with:**
 - H7: Managing the development of purpose-built student accommodation.
 - BTR1: Build to Rent housing.
 - E6: Affordable workspace.
 - SSE7: Provision of public toilets.
 - BG1: Green infrastructure and biodiversity in new development.
 - BG4: Trees.
 - BG5: Biodiversity and access to Bristol's waterways.
 - GI A: Open space for recreation.
 - T3A: Transport development management.
 - T4A: Parking, servicing and the provision of infrastructure for electric vehicles.
 - NZC2: Net zero carbon development – operational carbon.
 - NZC3: Embodied carbon, materials and circular economy.
 - NZC4: Adaptation to a changing climate.
 - FR1: Flood risk and water management.
 - FS2: Provision of food growing space in new developments.

Appendix 2: DC3: Alterations to existing buildings – Local planning authority policy comparisons

The Royal Borough of Kensington and Chelsea – New Local Plan Review – Adopted July 2024

Policy CD13: Existing Buildings - Extensions and Modifications

[Policy wording]

The Council will require extensions and modifications to existing buildings to be subordinate to the original building, to allow the form of the original building to be clearly understood, and to reinforce the character and integrity of the original building, or group of buildings. To deliver this the Council will resist proposals for extensions if:

- A. the extension would extend rearward beyond the existing general rear building line of any neighbouring extensions;
- B. the extension would rise above the general height of neighbouring and nearby extensions, or rise to or above the original main eaves or parapet;
- C. the extension would spoil or disrupt the even rhythm of rear additions;
- D. the detailed design of the addition, including the location or proportions or dimensions of fenestration or the external materials and finishes, would not be in character with the existing building;
- E. the extension would breach the established front building line;
- F. an important or historic gap or view would be blocked or diminished;
- G. the architectural symmetry of a building, terrace or group of buildings would be impaired;
- H. the original architectural features on a formal flank elevation would be obscured;
- I. access to the rear of the property or of those adjoining would be lost or reduced;
- J. a conservatory is proposed to be located at roof level, significantly above garden level or on a corner site.

[Explanation text equivalent]

Existing buildings – extensions and modifications

6.121 The combination of the borough's high land values, high residential densities, modest building heights and the expanse of the conservation areas, has resulted in pressures for a wide variety of residential extensions and modifications.

6.122 It is important that extensions and modifications, including conservatories, respect those aspects of character and integrity of the original building and group of buildings that contribute to local distinctiveness such as height, width, depth, building line, footprint, position, symmetry, rhythm, materials, finishes, detailed design, proportions or dimensions of fenestration, important gaps and a sense of garden openness.

6.123 The rear and sides of some buildings may also be distinguished architecturally. Where, for example, they overlook communal gardens, these elevations may be of as much importance as the front. While these elevations of buildings are generally subordinate to the front, they often have a simple dignity and harmony which makes them attractive.

6.124 Extensions and infill development may have an unfortunate effect in closing an important townscape gap, or in unbalancing an otherwise symmetrical elevation of a terrace, detached or semi-detached property.

6.125 Conservatories are a popular form of residential extension in the borough. They are principally garden features and should be located with this principle in mind. It is important that they fit in with the historic character of the borough and therefore their location in relation to the building and 263 garden, their impact on neighbouring properties, their size and detailed design will be carefully considered.

6.126 Some modifications to buildings have the potential to cause harm, especially if they are not sensitive to the original character of the building or their cumulative impact detracts from the external appearance of the building. Conversely, if handled in a careful and sympathetic manner they have the potential to result in an improvement to the quality and character of the building. Such details may include changes to windows or glazing patterns; projecting mouldings; chimneys and other architectural details; front walls; railings; the replacement of panelled entrance doors; the repair or replacement of stucco; the permanent removal of projected mouldings and the rendering or painting of a brick-faced building.

London Borough of Merton – Local Plan 2024-2037/38 – Adopted 20 November 2024

[Policy D12.4 Alterations and extensions to existing buildings](#)

[Policy text]

1. Most of the development that takes place in Merton is alterations and extensions to existing buildings. This policy ensures that inclusive, sustainable, efficient and high quality design is also maintained for existing buildings across the urban and suburban environment found in Merton.
2. To achieve high quality design and protection of amenity within the borough, alterations or extensions to buildings will be expected to:
 - a. Be of high quality design that responds to local character.
 - b. Respect the form, scale, bulk, and proportions of the original building.
 - c. Use robust external materials that will be appropriate to the original building and to its surroundings.
 - d. Be sympathetic to the built form pattern of the area and avoid the creation of long conjoined facades where this would be of detriment to the character and appearance of the area.
 - e. Ensure that noise, vibrations or visual disturbance resulting from the development do not diminish the living conditions of existing and future residents.
 - f. Seek to minimise carbon emissions in accordance with the chapter on Climate Change.
 - g. Ensure that roof forms, including dormer windows, are of an appropriate size, type, form and material for the existing building and surrounding context, such that they are not unduly dominant, and respect the prevailing positive characteristics of the area.
 - h. Demonstrate that the proposal does not significantly impact the quality of neighbouring buildings and amenity through overshadowing and overlooking.

- i. Seek to improve levels of biodiversity through interventions such as green roofs, sustainable drainage or soft landscape.
- j. Ensure that there is no increase in risk of flooding to surrounding area, either due to displacement of floodwater or diversion of flood flowpaths.

[Explanation text equivalent]

Well-designed buildings

12.4.1. Well-designed buildings make an important contribution to the character and quality of an area. Extensions must be as well-designed and architecturally competent as new buildings. Whether visible from the street or not, all extensions should be of a high quality design. Generally, extensions should be sited to the rear of the building and have a minimal impact on the street scene. Side extensions and those on street corners which will be visible must exhibit particular care in their design and how they relate to both the host building and the street scene. High quality contemporary extensions in a contrasting architectural style to the original may in some cases be appropriate. The council will welcome these on a case-by-case basis. They must be of the highest architectural quality and thoroughly reasoned in relation to the host property and immediate context.

12.4.2. The applicant should demonstrate the impact their proposal has on the street scene and neighbouring buildings through drawings that include contextual information and their Design and Access Statement.

12.4.3. Spaces between buildings should generally be respected. The conjoining of buildings, particularly in areas where a clear rhythm exists such as a street of semi-detached homes, should be avoided as this could have a negative impact on the local character.

12.4.4. The council's Borough Character Study SPD, Conservation Area Character Appraisals SPD's and Small Sites Toolkit SPD should be used to provide applicants with design guidance.

12.4.5. The borough has a few examples of high quality contemporary infill development and wishes to promote this further in the right context. It will therefore encourage new extensions to be contemporary in form where the architectural quality is exceptional and the building and context can sustain this without having a negative impact on the host building or adversely affecting a positive prevailing street character. Design and Access Statements

12.4.6. Development proposals should be based on an assessment of character and recognise the local distinctiveness of areas and emphasise a positive local sense of place. Planning applications shall be accompanied by a Design and Access Statement (DAS) to demonstrate how the design has been arrived at.

London Borough of Barking and Dagenham – Local Plan 2020-2037 – Adopted September 2024

[Policy DMD 5: Householder extensions and alterations](#)

[Policy text]

1. Proposals must not significantly impact on quality of life for neighbouring residents. All development proposals for extensions and alterations will need to be designed in a sensitive and appropriate manner, and must respect and complement the character of the area in which they are located and the appearance of the

original house and the group of buildings of which it forms a part. The Council will expect that:

- a) any proposed extension or alteration to a property should be sympathetic and subordinate to the design of the original dwelling with regards to scale, form, materials and detailing
- b) an extension should not cause harmful visual impact upon the street scene, for example, the space between properties should be considered and any loss of such spaces should be avoided
- c) extensions should be designed to be respectful of neighbouring privacy, considering the impact on the amenity of neighbouring properties
- d) extensions should take into account the positive aspects of the existing roofscape of the area and seek to apply the same style as the roof of the original property including the pitch, eaves treatment and materials used
- e) an extension should be well laid out, bright, spacious and accessible for all
- f) where practicable, any extension or alteration should be energy efficient and incorporate renewable energy sources.

City of Westminster – City Plan 2019-2040 – Adopted April 2021

Policy 40: Townscape and Architecture

[Policy text – subsection ‘Alterations and extensions’]

D. Alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings and spaces that contribute positively to Westminster’s distinctive townscape.

[Explanation text equivalent – subsection ‘Alterations and extensions’]

40.6 / Given the densely developed character of the city, extensions to existing buildings (both upwards and outwards) have an important role to play in meeting the growth ambitions of this plan. They can provide room for expanding families, may provide additional housing units, and can allow businesses to grow, as part of single or mixed-use development.

40.7 / Works to alter and extend existing buildings will be supported where they are successfully integrated with their surroundings. To achieve this, extensions should be subordinate to the host building, respecting the scale, detailing and materials of both existing buildings and adjoining townscape. Care should always be taken not to disfigure buildings or upset their proportions and to ensure good standards of amenity as set out in Policy 7.

40.8 / Roof extensions can be a practical way to create additional floorspace but can also have a significant impact on the character and appearance of buildings and the wider townscape, and a sensitive approach and highest standards of design will be required.

40.9 / National and London Plan policy identifies the potential for building upwards to increase housing supply. Where upwards extensions will allow the creation of additional residential floorspace to provide family housing or new self-contained residential units and they are sympathetic to the townscape context, they will be supported.

40.10 / Many of Westminster's residential areas are characterised by terraced housing of consistent design. On terraced houses of the Georgian and Victorian eras, mansards will very often be the most appropriate form of roof extension. However, this will depend on the age and style of the building. Where mansards or other roofs are an established feature within a group of buildings, roof extensions which follow the established pattern will usually be considered acceptable, but they should respect existing architectural features such as chimneys, party wall upstands, parapets and cornices.

40.11 / If properties affected form part of a group or terrace that remain largely unaltered or have a historic or distinctive roofscape integral to the architectural character of that building, further upward extension may be unacceptable, and the design of development proposals will need to be especially carefully considered. Where a terrace retains a uniform roofline with no roof extensions, the addition of one roof extension or multiple roof extensions of different designs can cause harm to the appearance of the roofscape. However, we will consider applications which would take a coordinated approach, adding roof extensions of consistent design to a complete terrace with a uniform roofline. This will typically be on Georgian and Victorian terraces where mansard roof extensions can be accommodated behind a parapet. In such cases we will require extensions across the whole terrace group to be implemented at one time and this may be secured by legal agreement. Upwards extension will usually be inappropriate where a mansard or other later roof extension already exists.

40.12 / While one additional storey will often be most appropriate, larger extensions of more than one storey may be appropriate in certain locations, particularly in commercial locations with more varied townscape character including the Opportunity Areas, in the International Centres of the West End and Knightsbridge and the Queensway/ Westbourne Grove Major Centre, and in other commercial locations on the Transport for London and Strategic Road networks which are characterised by a larger scale of townscape. In these locations more than one storey will be supported where it is demonstrated it can be designed to minimise harm to townscape, amenity and heritage assets and will help fulfil growth targets. This will depend on townscape context. Not all of the buildings within areas identified will be suitable for roof extensions and there may be other commercial locations across the city where larger roof extensions can be accommodated.

40.13 / The creation of larger extensions to existing buildings may also lead to additional challenges and the capacity to support additional loading will be an important factor in determining the feasibility of delivering such rooftop development. Where substantial demolition of existing buildings will be required to allow for additional height this will be considered having regard to the criteria set out in heritage policy.

40.14 / Even small-scale alterations and additions can have a cumulative impact on townscape character. The design of new doors, windows or shopfronts should be carefully considered to relate sensitively to the existing building and adjoining townscape. Additions such as plant, balustrades, fire escapes routes, telecommunications equipment, cameras and alarms, micro-generation equipment, any associated cables and fixings, as well as air conditioning units, flues and water tanks should always be carefully designed, sited and detailed or screened where appropriate.

Wakefield District – Local Plan – Adopted January 2024

Policy LP57: Extensions and Alterations to Dwellings

[Introductory text equivalent]

7.186 Although extensions and alterations to dwellings are often small in scale, they can have a significant impact on amenity and the character of the area. Proposals for extensions and alterations to dwellings should respect the design features on the host building and the character of the surrounding area. Some minor extensions or alterations to dwellings will fall into the category of permitted development. Where planning consent is required, the Council will oppose proposals which would have a detrimental impact on the amenity of occupiers or users of neighbouring buildings. Further policy and advice is set out in the Wakefield District Residential Design Guide 2018. Householders also have an opportunity to increase biodiversity net gain through such measures as bat or bird boxes, swift bricks and fences with pre-cut holes for hedgehogs or appropriate native planting.

[Policy text]

Extensions and Alterations to Dwellings

Throughout the district's settlements are a diverse range of residential neighbourhoods, many of which have distinctive local characteristics which shall be maintained or enhanced. Extensions and alterations to dwellings shall respect residential amenity, the character and scale of the dwelling, and its location. Development will only be permitted if it would not:

- a. Be overbearing or reduce the space about the dwelling resulting in significant harm to residential amenity or character of the area;
- b. Significantly reduce the privacy of occupants of the dwelling or neighbouring properties;
- c. Significantly overshadow neighbouring dwellings resulting in harm to the amenity of occupants of the dwelling or neighbouring properties;
- d. Be discordant with the style of the original dwelling or result in harm to the character of the area.

Liverpool City Council – Liverpool Local Plan 2013 – 2023 – adopted January 2022

Policy UD7 Alterations and extensions to existing buildings

[Policy text]

Alterations and extensions to existing buildings should ensure that:

- a. The scale, proportion, form, materials and character of the existing building are considered in the proposals;
- b. The impact is minimised on neighbouring properties in terms of overshadowing, overlooking, noise and fumes;
- c. Adequate amenity space is retained for the occupiers of the building;
- d. Distinctive historic features on the existing building are retained;
- e. Sufficient space is retained within the curtilage of the property for adequate containment of waste;
- f. The overall character of the area is retained; and

- g. Every effort is made to improve access for disabled people; existing access must not be reduced.

[Explanation equivalent]

10.26 It is important that the design of alterations and extensions to existing buildings is of the highest quality and reflects the character of the existing building, adjacent properties and the area. Extensions can have a major impact on the appearance of an area, and poorly designed extensions and alterations may have an adverse impact on the quality and character of the area; this policy seeks to ensure extensions are of high design quality.

Mansfield District Council – Local Plan – 2013 – 2033 – Adopted September 2020

Policy P6: Home extensions and alterations

[Policy text]

1. Development proposals to extend and/or alter an existing dwelling, including the provision of separate buildings within the curtilage for habitable or other purposes related to the domestic use of the property will be supported, provided that there is:
- a. no significant adverse impact on the character and appearance of the dwelling or street scene, or the wider surrounding area;
 - b. no significantly reduced residential amenity of nearby existing occupiers or future occupiers of the property itself; and
 - c. sufficient parking and outdoor amenity space.

Explanation text

4.45 Applications for residential extensions and alterations are some of the most common applications that local planning authorities deal with. They also have the potential to directly impact on the character of areas and the amenity of neighbouring residents. Planning applications for home extensions and alterations should demonstrate that they meet the requirements of Policy P6.

4.46 Not all extensions require planning permission, as certain alterations are covered by permitted development rights. Applicants are advised to check with the council for information regarding extensions prior to undertaking work.

4.47 Listed buildings and buildings within conservation areas are also subject to relevant policies and legislation. Where a protected species might be impacted, extensions and alterations are also subject to Policy NE2 and protected species legislation.

Appendix 3: Heritage at Risk Assets in Bristol

Sites wholly within Bristol authority area

1. Stokes Croft
Designated Site Name: Stokes Croft
Heritage Category: Conservation Area
CA Survey Uid: 5219
2. Church of All Hallows, All Hallows Road, Bristol
Designated Site Name: Church of All Hallows
Heritage Category: Listed Building grade II
List Entry Number: 1201954
3. Church of St Mary the Virgin, Church Close, Bristol
Designated Site Name: Church of St Mary The Virgin Heritage
Category: Listed Building grade II*
List Entry Number: 1205113
4. Church of St Alban
Designated Site Name: Church of St Alban, Coldharbour Lane, Bristol
Heritage Category: Listed Building grade II
List Entry Number: 1280268
5. St Mary-le-Port Church, High Street, Bristol
Designated Site Name: St Mary-le-Port Church
Heritage Category: Scheduled Monument
List Entry Number: 1021385
6. 31 and 32, Portland Square, St Pauls, Bristol
Designated Site Name: 31 And 32, Portland Square, BS2 8RG
Heritage Category: Listed Building grade I
List Entry Number: 1208879
7. Stair turret (Holy Cross), Inns Court Vicarage, Inns Court Green, Knowle, Bristol
Designated Site Name: Holy Cross Inns Court Vicarage
Heritage Category: Listed Building grade II*
List Entry Number: 1202314
8. Swing Bridge over North Entrance Lock, Cumberland Basin, Bristol
Designated Site Name: Brunel's Swing Bridge Alongside North Entrance Lock
Heritage Category: Listed Building grade II*
List Entry Number: 1202186
9. Kingsley Hall, 59 Old Market Street, Bristol
Designated Site Name: Kingsley Hall
Heritage Category: Listed Building grade II*
List Entry Number: 1207565
10. Two lodges and attached garden walls opposite former Kings Weston stables, Napier Miles Road, Bristol
Designated Site Name: Two Lodges and Attached Garden Walls Opposite Former Kings Weston Stables
Heritage Category: Listed Building grade II*
List Entry Number: 1187186

11. Brislington House, Bristol
Designated Site Name: The Park and Garden To Brislington House (known as Long Fox Manor)
Heritage Category: Registered Park and Garden grade II*
List Entry Number: 1001529
12. Civil War earthworks on Brandon Hill, Brandon Hill, Bristol
Designated Site Name: Civil War Defences on Brandon Hill
Heritage Category: Scheduled Monument
List Entry Number: 1006989
13. Anti-aircraft gun site, Purdown, Bristol
Designated Site Name: Second World War heavy anti-aircraft battery 590m north east of Highwood House, Pur Down, Bristol
Heritage Category: Scheduled Monument
List Entry Number: 1004531

Cross boundary sites

14. Stoke Park, Stoke Gifford
Designated Site Name: Stoke Park
Heritage Category: Registered Park and Garden grade II
List Entry Number: 1000129
Boundaries: Dower House and some of the parkland is located within South Gloucestershire, the majority of the parkland is within Bristol City Council's authority area.