

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

Matter 4: Development Strategy and Site Selection Process

This statement sets out the council's response to the Inspectors' matters, issues and questions regarding development strategy and site selection process 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 4.1: Whether the development strategy and strategic policies of the Plan are positively prepared, justified, effective and consistent with national policy?

General Strategy Questions

Q4.1: Are the specific areas of growth and regeneration justified, consistent with the development strategy and the Plan's overall Vision and Objectives?

Council's response

1. The areas of growth and regeneration in Chapter 4 collectively comprise an essential core of the overall development strategy and are consistent with the plan's vision and objectives. The table which follows local plan paragraph 2.10 shows the relationship between the local plan chapters and policies and the aims and objectives.

2. The local plan has been in preparation for some time, with some areas of growth and regeneration representing a continuation and evolution of approach from the current local plan. The emerging plan's development strategy has been a material consideration in development proposals which have arisen. Regeneration frameworks have existed, have been prepared or are being prepared that reflect the emerging local plan. It is noted, for information, that development has occurred, planning permissions have been granted or planning applications are pending in a number of the areas of growth and regeneration including DS1A Bristol City Centre – Broadmead, Castle Park and the Old City, DS2 Bristol Temple Quarter; DS3 St Philip's Marsh; DS4 Western Harbour; DS5 Frome Gateway; DS7 Central Fishponds; DS8 Central Bedminster; DS13 Lockleaze and DS14 Central Southmead.

Q4.2: Several of the policies for areas of growth and regeneration refer to development having to 'accord' with regeneration frameworks. Notwithstanding the Council's response to PQ9, is it justified or effective for proposals to have to 'accord' with documents that do not form part of the development plan?

Council's response

3. As set out in the council's response to inspectors' preliminary question PQ9.

Q4.3: Several of the policies for areas of growth and regeneration refer to comprehensive or co-ordinated forms of development. The response to PQ28 states that this would be guided by masterplans or development frameworks and established through design and access statements. Having regard to this, are the relevant policies 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

4. As set out in the council's response to inspectors' preliminary question PQ28.

Q4.4: The reasoned justification for several policies refer to potential housing capacity figures. The response to PQ23 confirms that these are not meant to be a target or a requirement. Notwithstanding this, are the anticipated capacities justified? Without a requirement for each area, and no specific allocations within any of the areas, will the relevant policies be effective in delivering the anticipated levels of housing?

Council's response

5. The identified capacities are justified and exist within the context of the overall uncapped housing requirement set out in Policy H1. The response to PQ23 discusses the capacities and the approach to regeneration is explored in the Sustainability Appraisal.

6. The development strategy policies, supported by relevant area specific frameworks and masterplans will be effective in ensuring a supply of planning permissions for at least the anticipated capacities. As is the case nationally, it is likely that external factors such as overall economic performance, development economics, regeneration capacity and spending decisions will ultimately determine whether the anticipated levels materialise on each site. However, the policies are positive enablers of delivery by facilitating the intentions for each location, with both clear and flexible approaches to development which support delivery within and beyond the plan period.

Q4.5: Several of the policies for areas of growth and regeneration set out the expectation for a range of uses to come forward over the plan period. Other than for housing (as set out above) there is no indication in any policy or reasoned justification as to the scale of development expected. Are the relevant policies sufficiently clear as to what type and scale of development is envisaged?

Council's response

7. The policies provide an appropriate level of information and enable a flexible approach to delivery in the regeneration areas. The overall levels of provision for key uses in the plan is set out in policy H1 and E2. In the case of purpose-built student

accommodation, the level of provision being made is indicated by a cross reference to Policy H7.

8. Alongside this flexible policy context, area frameworks and masterplans will provide further guidance to support delivery. For example, the Whitehouse Street Regeneration Framework which covers part of the Central Bedminster policy area (Policy DS8) indicates an approach to employment space (15,000m² in that case) to ensure no net loss of jobs (page 7).

Q4.6: The reasoned justification for several of the policies for areas of growth and regeneration include reference to possible housing densities. Are these justified and, to be effective, should they be included in policy? How do these densities relate to other relevant policies, such as policies UL1 and UL2?

Council's response

9. The approach to density is set out where relevant in each policy, which may be supported by commentary in the explanatory text. The approaches to density are reflective of policies UL1 and UL2 and appropriate having regard to the character of each area and the aspirations for each regeneration area.

10. Further questions (below) ask about the approach to density in each development strategy area. The responses to those questions complete this answer.

Issue 4.2: Are the policies relating to Central Bristol justified, effective and consistent with national policy?

The Council's response to PQ30 indicates that the city centre, which forms the core of the largest city in the region, continues to be a focus of regional importance. Paragraphs 3.1.3-3.1.9 of the new Bristol Local Plan describe the features which contribute to this role.

Policy DS1: Bristol City Centre

Q4.7: Is Policy DS1 justified, consistent with national policy and effective? In particular:

Development up to 2040

a) Would the policy be effective in strengthening the role of the City Centre as a focus of regional importance and is the approach justified?

Council's response

11. Policy DS1 intends that the city centre's role as a regional focus at the centre of a global 24-hour city will be promoted and strengthened.

12. The policy shares similar approaches to existing local plan policy BCS2 (DPD001) which helped to enable the modernisation of retail and leisure, new education facilities of national importance, enhanced transport facilities, tourism related developments, cultural buildings and facilities in the city centre.

13. National policy places significant emphasis on centres. Policy DS1 is consistent with paragraph 88 of NPPF September 2023. The latest version of the NPPF continues the approach of its predecessor.

Q4.7 b) Having regard to paragraph 3.1.4 which indicates that the overall area has the potential to accommodate thousands of new homes, is the anticipated housing capacity of 2,500 set out in paragraph 3.1.10 justified. To be effective, should the policy identify the expected level of housing delivery in this area?

Council's response

14. Policy DS1 deals with the city centre as a whole, which contains four regeneration areas addressed separately by policies DS1A, DS2, DS4 and DS5. There is no overall housing capacity stated for the city centre, with the reference to 2,500 homes in paragraph 3.1.10 referring only to the Bristol City Centre – Broadmead, Castle Park and the Old City area covered by policy DS1A.

15. For clarity it is suggested that the final sentence of paragraph 3.1.10 is deleted. This has been added to the schedule of suggested main modifications (EXA002):

3.1.10 Residential development will continue to be an important feature of the city centre, helping to bring vitality to the area and support its diversity. The new housing development referred to in this policy would be primarily for apartments and town houses with densities appropriate to a city centre location (Policies UL2 'Residential densities' and DC1 'Liveability in residential development including space standards'). This will include an estimated 2,500 homes within the City Centre Development and Delivery Plan area.

Q4.7 c) Is the policy sufficiently clear in defining what uses would be acceptable within the City Centre area?

Council's response

16. Policy DS1 indicates the range of appropriate uses within the city centre as a whole. The policy enables a flexible approach to a dynamic area. A number of uses which will be included are specified. The policy indicates that development to 2040 will include homes, offices, infrastructure and supporting facilities, university and hospital development, purpose-built student accommodation, open space, public realm and green infrastructure. There are specific references to the regeneration areas within the city centre which are subject to further policies.

Q4.7 d) Is it clear what level of student accommodation is expected to be provided in the overall area and is this justified?

Council's response

17. Regarding student accommodation the policy cross refers to Policy H7, which makes provision for a number of areas within the city centre and elsewhere.

Q4.7 e) i) Will the policy be effective in consolidating and expanding University of Bristol and Bristol Royal Infirmary sites?

Council's response

18. The policy provides for the continuing consolidation and expansion of these sites, subject to the main modification already proposed to policy DS1 and consequential modification to the Policies Map to show the university and hospital precincts.

Q4.7 e) ii) Paragraph 3.1.13 refers to additional 'policy' detail being provided on university and hospital development as supplementary planning guidance (masterplans or other agreed documents). Is this approach justified and consistent with national policy?

Council's response

19. For clarity the paragraph could be reworded as follows. This has been added to the schedule of suggested main modifications (EXA002):

3.1.13 Additional policy detail Further planning guidance may be prepared in the future regarding university and hospital development ~~may be added as supporting planning guidance in the future~~ in the form of masterplans or other agreed documents.

**Q4.7 f) Culture and diversity of uses
Is the policy consistent with Policies CF1 and CF2?**

Council's response

20. The policy has similar provisions for culture and diversity of uses as the current local plan Policy BCS2 (DPD001), including interactions with policies for community uses.

21. The supports and encourages facilities and services which contribute to the diversity of uses within the city centre. The other local plan policies referred to would be CF1 and CF2 and SSE3.

**Q4.7 g) Floating Harbour
The Floating Harbour is referred to in Policy DS1 'Bristol City Centre' and is referred to in the Harbour Place Shaping Strategy. Would Policy DS1 be effective in maintaining the role of the Floating Harbour as a location for maritime industries, water related activities, as well as a visitor destination and heritage asset?**

Council's response

22. The policy effectively addresses the role and importance of the harbour, working in tandem with the designation of maritime industry areas proposed under policy E4.

23. The relevant paragraph of the policy uses the same wording as existing local plan policy BCS2 (DPD001).

Q4.8: Are the requirements set out in Policy DS1 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) What particular measures would a decision maker expect to be provided for major development in demonstrating enhancement of social inclusion and community cohesion? Are the examples referred to in paragraph 3.1.15 meant to cover this? ii) Is it clear what a decision maker would expect to see to demonstrate that opportunities have been taken to reduce severance of parts of the city from neighbouring communities?

Council's response

24. The inclusion and community cohesion aspects of the policy brings forward provisions from existing Local Plan Policy BCS2 (DPD001). The examples in 3.1.15 are relevant but not exhaustive. Unmentioned and innovative measures would also be supported where they help to create social inclusion.

25. Decision makers would expect to see a range of opportunities taken which would depend on the nature and scale of the proposal but might include enabling crossings of intervening infrastructure and the reestablishment of existing or creation of new routes. Similar measures have been addressed by developments since BCS2 was adopted.

26. These aspects of the policies respond to chapter 8 of the NPPF.

Q4.8 b) Are the requirements in relation to heritage assets consistent with Policy CHE1 and national policy?

Council's response

27. The policy advises that the design of development will be expected to demonstrate high-quality place making in terms of conservation of heritage assets, indicating that regard to the area's important heritage assets should be had, with reference to character appraisals and other supporting policy and guidance.

28. This approach appropriately reflects national policy and operates in the context of policy CHE1 which addresses the approach to individual proposals / heritage assets.

Q4.8 c) Is the approach to tall buildings consistent with Policy DC2 and is it justified within this area?

Council's response

29. The city centre contains a number of tall buildings (height as defined in policy DC2), including current/recent builds, recent refurbishments and others that have been in situ for many years.

30. The policy indicates that tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development. This relates to and is consistent with Policy DC2 which indicates that Bristol City Centre is a location where tall buildings may be appropriate.

Q4.8 d) To be effective should the policy identify the expected level of office development to be provided within the area?

Council's response

31. The city centre has been and will continue to be the major focus for office development. This is consistent with national planning policy.

32. Policy E2 indicates that the plan makes provision for the delivery of 164,000m² of additional office floorspace. The policy states that there will be an emphasis on the office sector in in Bristol City Centre.

33. Policy DS1 indicates that development up to 2040 will include high quality offices and flexible workspace. Supported by relevant frameworks / masterplans, this approach enables delivery.

Q4.8 e) Are the remaining place principles (density and mixed use, heritage assets, street design, ground floor uses and public access) clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

34. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS1 they aim to ensure certain forms of development are encouraged. They address measures relating to cohesion and severance and show what is expected of the design of development in terms of specified issues. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

35. In policy DS1 some of the place principles are shown in error as a bulleted list. To ensure the policy is clear and effective, a modification has been included in the schedule of suggested main modifications (EXA002) to remove the bullets and adjust the surrounding punctuation accordingly.

36. Regarding density and mixed use, the policy encourages higher density mixed-use development. This reflects similar approaches in existing local plan policy BCS2 (DPD001).

37. Regarding heritage assets, the policy advises that the design of development will be expected to demonstrate high-quality place making in terms of conservation of heritage assets, indicating that regard to the area's important heritage assets should be had, with reference to character appraisals and other supporting policy and guidance.

38. The street design section indicates that development will give priority to active and sustainable modes, which is particularly relevant in the city centre context.

39. To correct a further error, the sentence regarding active ground floor uses should be completed with 'will be encouraged'. This has also been included in the schedule of suggested main modifications (EXA002).

40. Regarding public access, the policy is a continuation of the approach in policy BCS2, which uses the same language. Inclusion of these measures is appropriate within the city centre area.

41. Developments which have appropriately addressed the place principles alongside other relevant policies would be consistent with the local plan, having regard to paragraph 11 of the NPPF (September 2023).

The design of development will be expected to demonstrate high quality place making in terms of appearance, function, conservation of heritage assets, sustainability and maintaining and enhancing green infrastructure:

- Proposals will have regard to the area's important heritage assets and respond appropriately to key views and landmarks set out in the relevant Conservation Area Character Appraisals and other supporting policy and guidance.

- Tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development, in accordance with Policy DC2 'Tall buildings'.
- Street design will give priority to pedestrian access, cycling and public transport.
- Active and inclusive ground floor uses will be encouraged.
- New development should include measures to secure public access and routes for walking, cycling and public transport, including access to waterfront areas consistent with policy BG5 'Biodiversity and access to Bristol's waterways'.

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

Q4.9: Is Policy DS1A justified, consistent with national policy and effective? In particular:

a) Is it necessary for the policy to state what development up to 2040 will include, to be consistent with the other City Centre DS policies?

Council's response

42. The policy flows from policy DS1, which states what development up to 2040 will include. It provides a localised approach to this location, with reference to the City Centre Development and Delivery Plan that has been prepared for the area.

Q4.9 b) Will the policy be effective in creating a mixed-use city centre neighbourhood?

Council's response

43. In conjunction with policy DS1 the policy enables the delivery of a range of uses which would contribute to the creation of a mixed-use neighbourhood.

Q4.9 c) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

Council's response

44. Policy DS1 indicates the range of appropriate uses within the city centre as a whole. Policy DS1A promotes a greater mix of uses than existing and confirms that the area will remain as the principal shopping location with a diversified offer. Both policies enable a flexible approach to a dynamic area. Development in the area is supported by the City Centre Development and Delivery Plan (EXA008, EXA008a).

Q4.9 d) Is the boundary shown on the diagram at page 19 of the Plan appropriately defined?

Council's response

45. The policy area encompasses the principal development opportunities around Broadmead and Cabot Circus and the adjoining areas of the city's historic core

which present opportunities for associated regeneration and the improvement of connections. The policy area coincides with the City Centre Development and Delivery Plan (EXA008, EXA008a).

46. The image on page 19 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 25 'Page 25 City Centre, Redcliffe and Bedminster (north)' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS1A shown at the centre.

47. The policy area is also illustrated on the geographical diagram for Central Bristol on page 13.

Q4.9 e) Having regard to the Council's proposed main modification for Policy DS1A proposing a change to this part of the policy in response to PQ32, is this necessary for soundness? Is it justified to expect major development to provide a minimum of 10% of ground floor space for community or cultural use? Has this requirement been subject to viability testing and if not, why not?

Council's response

48. The response to PQ32 addresses these issues including the derivation of the policy and the market testing which informed this. The viability assessment makes allowance for the inclusion of provisions of this nature. See also the response to Matter 6.

49. The recently permitted (Subject to S106 agreement) planning application of the redevelopment of the Galleries shopping centre in Bristol City Centre includes 10% of ground floor space suitably fitted out for the use of community and/or cultural organisations and made available at affordable rent. Provision has been made within the S106 agreement to secure a minimum 10% of ground floor space.

Q4.9 f) Paragraph 3.1.20 refers to Castle Street/Queen Street as being allocated in the Bristol Central Area Plan but that it is now identified as a potential development site in the City Centre DDP. Is this approach justified and it will it be effective in delivering the rest of the site?

Council's response

50. The site is owned by the council. Policies DS1 and DS1A set out the approach to development in the area. Any proposals for the site would be considered against those policies, which promote a range of different forms of development. Development proposals for the site are being explored by Goram Homes, which is a subsidiary of Bristol Holding Ltd., which is wholly owned by Bristol City Council.

Q4.10: Are the requirements set out in Policy DS1A justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Is the requirement to create new routes through urban blocks and restore historic street patterns justified and will it be effective?

Council's response

51. Creating new routes and restoring historic streets is appropriate and justified in preserving and enhancing heritage assets and responding to local distinctiveness consistent with the NPPF and National Design Guide.

52. The removal of historic routes occurred as part of wartime damage and post-war redevelopment. The reinstatement of historic routes has been a successful feature of recent city centre regeneration and continues to form a part of emerging proposals.

53. By way of example:

(i) the Cabot Circus development, completed in 2008, created several new routes, which were key to increasing its permeability and integration with surrounding communities such as St. Paul's.

(ii) the recent redevelopment of the nearby former Bristol Evening Post headquarters reinstated a section of historic Jacob Street.

(iii) the development permitted at St. Mary-Le-Port incorporates a reinstated Mary-Le-Port Street.

(iv) the development permitted at the former Debenhams store provides a significant new pedestrian link to St. James' Barton on the historic alignment of Barr's Street.

Q4.10 b) Are the requirements in relation to built and cultural heritage consistent with Policy CHE1 and national policy?

Council's response

54. The heritage approaches in Policy DS1 are applicable to proposals within the area covered by Policy DS1A and these are supported by Policy CHE1 and the various requirements set out in the NPPF (all relevant versions) and national planning practice guidance. Policy DS1A talks about the design of development incorporating and enhancing the area's built and cultural heritage.

Q4.10 c) Is the approach to tall buildings consistent with Policy DC2 and is it justified within this area?

Council's response

55. The policy indicates that tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development. This relates to and is consistent with Policy DC2 which indicates that Bristol City Centre is a location where tall buildings may be appropriate.

56. Tall buildings (height as defined in DC2) have recently been granted planning permission at Haymarket (former Premier Inn/Avon House currently being demolished) and at Haymarket/St James Barton (former Debenhams) and on Nelson Street/Rupert Street. There are existing tall buildings in the area located at Eclipse House, Fromsgate House, Whitefriars, Greyfriars (Number One Bristol), Castlemead, and adjacent to the policy area at Castle Park View (former ambulance station and Bristol Central Area Plan Policy 37 [DPD003]).

Q4.10 d) Are the requirements set out under the remaining place principles clear and unambiguous, such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

57. The remaining place principles are clearly expressed and set out considerations relating to public realm, connectivity and incorporation and enhancement of built and cultural heritage.

**Q4.10 e) Castle Park
Are the requirements in relation to development facilitating and contributing to enhancements to Castle Park justified and will they be effective?**

Council's response

58. Development in and adjacent to the area would impact on the open space and increase demand for its use. The approach is consistent with other policies which refer to the enhancement of green infrastructure, which state that enhanced open space should be provided in accordance with policy GI A and will be secured from new development.

**Q4.10 f) Old City
Are the requirements in relation to heritage assets consistent with Policy CHE1?**

Council's response

59. The approach to Old City is appropriate and it appropriately reflects national policy and operates in the context of policy CHE1 which addresses the approach to individual proposals / heritage assets.

Q4.10 g) Are the requirements in relation to development supporting the growth of independent retail at St Nicholas' Market and St Mary-le-Port justified? How will this requirement be applied in practice?

Council's response

60. A focus on independent business is a feature of the existing local plan in Policy BCAP37 (DPD003) which refers to an emphasis on providing an environment suitable for small and independent business. In practice this would be through the inclusion of smaller units and/or through mechanisms which facilitate the occupation of parts of the development by small and independent businesses. There is a planning permission for the redevelopment of the St. Mary-le-Port site which addressed the interaction with the adjacent St. Nicholas' Market.

Policy DS2: Bristol Temple Quarter

Q4.11: Is Policy DS2 justified, consistent with national policy and effective? In particular:

a) *Is the policy sufficiently clear in defining what uses would be acceptable within the area?*

Council's response

61. Policy DS2 is an enabling policy that explains that the area is being comprehensively developed for a wide range of uses in a new city quarter. It states the uses which will be included and goes on to indicate the overall approaches for four zones within the policy area.

62. Policy DS2 has a similar approach to the existing policy BCAP35 (DPD003), which set out what development would include. This is the policy which has been used to consider development in parts of Bristol Temple Quarter to date. Policy DS2 covers a larger area than BCAP35 as discussed below in Q4.11 b).

63. The policy is supported by an agreed development framework. The policy format is similar to BCAP35, which refers to a framework that was subsequently produced.

The Bristol Temple Quarter development framework was endorsed and published in April 2023 (EXA009).

Q4.11 b) *Is the boundary shown on the diagram at page 22 of the Plan appropriately defined?*

Council's response

64. The policy area encompasses the area covered by the existing local plan policy BCAP35 with certain additions, notably the Mead Street area to the southwest. The area has been in a process of regeneration for several years as part of the Bristol Temple Quarter regeneration project.

65. The image on page 22 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 26 'Page 26 Temple Quarter, Lawrence Hill and Totterdown' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS2 shown at the centre.

66. The policy area is also illustrated on the geographical diagram for Central Bristol on page 13 of the plan.

Q4.11 c) *Is the anticipated housing capacity of 2,500 set out in paragraph 3.1.26 justified? To be effective, should the policy identify the expected level of housing delivery in this area?*

Council's response

67. Policies DS2 and DS3 together provide the strategic policy for the regeneration of Bristol Temple Quarter. The overall vision for the regeneration project is to transform over 130 hectares of brownfield land into a series of thriving, well-connected, mixed-use communities¹. The regeneration of the area is intended to create 10,000 new homes and thousands of new jobs.

¹ [Bristol Temple Quarter regeneration](#)

68. The estimated capacity reflects the intentions for the Bristol Temple Quarter area (excluding St. Philip's Marsh) as set out in the agreed development framework (EXA009). This level is consistent with development of an area of this scale at the minimum densities indicated through policies UL1 and UL2 and generally with making best use of previously developed land.

69. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS2 as drafted sets out that development will include new homes with a mix of types, sizes and tenures and that development will have a density consistent with a city centre location. Taken together, the policy, its explanation and the context provide an effective approach to enabling the substantial number of homes envisaged. Should the opportunity arise to exceed the estimated 2,500 homes referred to, the policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

Q4.11 d) Is it clear what level of student accommodation is expected to be provided in the overall area and is this approach justified?

Council's response

70. Regarding student accommodation the policy cross refers to Policy H7. For the Bristol Temple Quarter and St Philip's Marsh areas H7 makes provision for 4,600 additional student bed spaces across the two areas. For proposals which would result in this provision being exceeded (in circumstances where this is supported by area specific guidance or where no guidance exists), H7 states that any proposals for purpose-built student accommodation should then meet the policy criteria for 'other locations' set out in policy H7. These include forming part of mixed-use developments comprising a proportion of other compatible residential uses, not resulting in a local imbalance, not conflicting with other planning objectives and where relevant providing a contribution towards affordable housing.

71. The approach is justified. It enables a significant contribution to meeting the identified need for student housing of 4,600 bed spaces allowing this to be exceeded in specified circumstances. This is consistent with the NPPF which expects local plans to address a range of housing needs. The policy also enables an appropriate balancing of such provision with the need to deliver other forms of new homes, mixed use developments and mixed and balanced communities consistent with national planning policy and the wider objectives and intentions of the regeneration area.

***Q4.11 e) Temple Meads area and Silverthorne Island
Are the aspirations for the Temple Meads area and place principles for Silverthorne Lane consistent with Policy CHE1 and national policy?***

Council's response

72. The aspirations in relation to Bristol Temple Meads Station are for transformation through imaginative enhancement, which as required by national policy and policy CHE1 would have regard to its particular significance as a Grade I listed building. In relation to Silverthorne Lane the policy states that the policy will preserve and enhance the conservation area, adjoining conservation areas and other heritage assets. This approach appropriately reflects national policy and operates in the context of policy CHE1 which addresses the approach to individual proposals /

heritage assets. As set out in response to 4.12(c) below, a modification is proposed regarding safeguarding the setting of Bristol Temple Meads Station.

73. For information, in these two areas a number of development proposals have received planning permission or are in the process of development:

- A longstanding semi-derelict former mail depot at Cattle Market Road was demolished in recent years and has been replaced with the University of Bristol's new enterprise campus which is under construction. Planning permissions have been granted for developments at Temple Island and nearby on Feeder Road, the latter currently under construction.
- Planning permission has been granted for redevelopment of sites on Silverthorne Lane and some of these are currently under construction.
- At Clarence Road/Temple Gate, planning permission has been granted for development of former car showroom.

Q4.12: Are the requirements set out in Policy DS2 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Will the Place principles be effective in achieving the aspirations for the Temple Meads area, Silverthorne Island, Temple Island and the York Road/Mead Street area?

Council's response

74. The place principles complement the aspirations set out in relation to each location. Taken as a whole, the policy provides a means to secure development that meets those aspirations.

75. For information, a development brief for Mead Street was published in August 2022 which covers the York Road/Mead Street area.

Q4.12 b) Will the requirement for new development to support freight consolidation in the area be effective?

Council's response

76. Provision to support freight consolidation was listed as one of the forms of transport improvements development will be supported by, in addition to public transport provision, pedestrian route improvements, cycle provision and pedestrian route improvements. There are now no proposals for freight consolidation in Bristol Temple Quarter and an additional modification to remove the reference is proposed (EXA003).

Q4.12 c) Are the requirements set out under the remaining place principles (design, tall buildings, mix of housing, natural green space clear) and transport and flood risk clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

77. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS2 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

78. Regarding design, the policy refers to having a form, scale and density consistent with a city centre location. It indicates that tall buildings may be appropriate in accordance with policy DC2.

79. As a large scale regeneration area with intentions for thousands of homes, the place principles appropriately indicate that residential developments should contribute towards an appropriate mix of housing types.

80. The reference to natural green space continues an existing approach from policies BCAP23 and BCAP35 (DPD003). This relates to the Totterdown Basin area, which has natural green space value.

81. Regarding transport, the policy sets out the overall approach to transport improvements and incorporates a cross-reference to policy T1. The approach would be supported by other relevant transport policies.

82. The flood risk section links to policy FR2. It also addresses the approach to the sequential test and Flood Risk Assessment.

83. Developments which have appropriately addressed the place principles, transport and flood risk alongside other relevant policies would be consistent with the local plan, having regard to paragraph 11 of the NPPF (September 2023).

Heritage – setting of Bristol Temple Meads station

84. Historic England have noted that specific reference could be made to the setting of the Grade I listed Bristol Temple Meads station to help ensure its specific historic significance is properly considered by development in the area. The setting of heritage assets is a consideration under Policy CHE1 which would apply to proposals within the setting of Bristol Temple Meads station. Given the significance of the asset, it would be helpful to underline these considerations in Policy DS2. A suggested modification to the policy to include this is outlined below. This has been added to the schedule of suggested main modifications (EXA002).

Policy DS2, policy text, under subheading 'Place principles', insert the following after the third paragraph:

Any proposals will be expected to have regard to the historic significance of the Grade I listed Bristol Temple Meads Station and to safeguard its setting with regard to the key views to and from the station buildings.

Policy DS3: St Philip's Marsh

Q4.13: Is Policy DS3 justified, consistent with national policy and effective? In particular:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

Council's response

85. Policies DS2 and DS3 together provide the strategic policy for the regeneration of Bristol Temple Quarter. The overall vision for the regeneration project is to transform over 130 hectares of brownfield land into a series of thriving, well-connected, mixed-use communities². The regeneration of the area is intended to create 10,000 new homes and thousands of new jobs.

86. Policy DS3 is an enabling policy that explains that the area is being comprehensively developed for mixed uses including new homes in a regenerated city quarter. It states the uses which will be included and goes on to indicate the overall approaches for three broad zones within the policy area.

87. The policy will be supported by a masterplan, which will follow the agreed development framework. The Bristol Temple Quarter development framework, which includes St. Philip's Marsh, was endorsed and published in April 2023 (EXA009).

Q4.13 b) Is there an anticipated housing capacity for this area and if not, why not? To be effective, should the policy identify the expected level of housing, office and employment delivery in this area?

Council's response

88. Policies DS2 and DS3 together provide the strategic policy for the regeneration of Bristol Temple Quarter. The overall vision for the regeneration project is to transform over 130 hectares of brownfield land into a series of thriving, well-connected, mixed-use communities³. The regeneration of the area is intended to create 10,000 new homes and thousands of new jobs. The SHLAA report (EVEH01) indicates an estimated delivery of 4,000 homes for St. Philip's Marsh within the plan period.

89. Policy E2 sets out the provision to be made overall for office and industry and distribution development in Bristol. Within this context, policy DS3 expects development to ensure the retention, refurbishment, intensification and/or redevelopment and innovative reincorporation of workspace to ensure that the number of jobs supported by the area is increased and that the diversity of business and economic development is maintained and enhanced. This is expressed in more specific detail in relation to each of the three broad zones identified by the policy.

90. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS3 as drafted sets out that development will include thousands of new homes with a mix of types, sizes and tenures and that development will have a form and density consistent with its central urban location. Taken together, the policy, its explanation and the context provide an effective approach to enabling the substantial number of homes envisaged. Should the opportunity arise to exceed the estimated 4,000 homes identified by the SHLAA in the plan period, the policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

² [Bristol Temple Quarter regeneration](#)

³ [Bristol Temple Quarter regeneration](#)

Q4.13 c) Is the boundary shown on the diagram at page 25 of the Plan appropriately defined?

Council's response

91. The policy area encompasses the remainder of the Bristol Temple Quarter regeneration project. The policy is intended to supersede the approach of the existing local plan at this location (policy DM13).

92. The image on page 25 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 26 'Page 26 Temple Quarter, Lawrence Hill and Totterdown' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS3 shown at the centre.

93. The policy area is also illustrated on the geographical diagram for Central Bristol on page 13.

**Q4.13 d) North west St. Philip's Marsh
Is the aspiration for this area to be a knowledge based, employment lead innovation area justified having regard to the evidence base, and will the policy be effective in this regard?**

Council's response

94. At the heart of the area is the University of Bristol's Temple Quarter Enterprise Campus which is at an advanced stage of construction. At TQEC the University is intent on delivering transformational research focusing on digital technologies. This research is very much to be focused on deliverable business models and industrial connections that will enable the research to be spun out into new business creation. The Bristol Digital Futures Institute (BDFI) is already in situ having opened research facilities in 2024.

94A. The Employment Land Topic Paper (TPC003) prepared to support the draft Local Plan includes detail on economic forecasts which suggest potential for substantial jobs growth in professional, technical and scientific, human health and social work activities, education and information and communication sectors amongst others. It also notes demand from the creative and digital and life sciences sectors. The evidence base also notes demand from occupiers of office space for floorspace within a 15 minute walk of Temple Meads Station, which regeneration of the St. Philip's Marsh area will make easier.

94B. The presence of the university campus and market potential suggests that the aspiration is justified. The aspiration of the policy is to support this emerging quarter and allow the spin-out opportunities to be accommodated. The policy provides a basis for a range of property typologies needed by these sectors to be developed, with the connectivity, infrastructure and high quality public realm needed to make these sites attractive to occupiers.

Q4.13 e) Are the requirements in relation to the River Avon frontage and Feeder Road justified?

Council's response

95. The approach to the River Avon frontage is consistent with policy FR2. The policy indicates that development along Feeder Road will address and enhance its canal-side environment.

Q4.14: Are the requirements set out in Policy DS3 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Will the Place principles be effective in achieving the aspirations for the sub areas?

Council's response

96. The place principles complement the aspirations set out in relation to each location. Taken as a whole, the policy provides a means to secure development that meets those aspirations.

Q4.14 b) Is the requirement to enhance Sparke Evans Park justified and will it be effective?

Council's response

97. Development in and adjacent to the area would impact on the open space and increase demand for its use. The approach is consistent with other policies which refer to the enhancement of green infrastructure, which state that enhanced open space should be provided in accordance with policy GI A and will be secured from new development.

98. For clarity, the wording that specifically relates to Sparke Evans Park should be moved to the section of the policy text that addresses South St. Philip's Marsh. This has been added to the schedule of suggested main modifications (EXA002).

Policy DS3, policy text, 'South St. Philip's Marsh', insert the following after the 3rd paragraph:

Sparke Evans Park will be enhanced to serve the wider area and provide space for recreation.

Policy DS3, policy text, 'Place principles', 6th bullet, amend as follows:

Development will ensure the provision of appropriate green infrastructure and open space. Sparke Evans Park will be enhanced to serve the wider area and provide space for recreation;

Q4.14 c) What measures would a decision maker expect to be provided for development in demonstrating enhancement of social inclusion and community cohesion?

Council's response

99. There are a range of measures some of which are referred to in other policies in the local plan and discussed elsewhere in the response to Matters Issues and

Questions. The inclusion and community cohesion aspects of the policy brings forward provisions from existing Local Plan Policy BCS2 (DPD001). Decision makers would expect to see a range of opportunities taken which would depend on the nature and scale of the proposal but might include contributions and/or provision of community facilities and the provision of affordable workspace. Policy E1 will require major development proposals to contribute to enabling access to employment and removing barriers to employment for local residents by providing employment and skills plans.

Q4.14 d) Is the requirement for new workspace and other commercial development to assist in access to employment for local residents justified and will it be effective in this area?

Council's response

100. The approach relates to Policy E1 'Inclusive economic development'. It is appropriate in the context of this major regeneration area at a central location in the city.

Q4.14 e) Is the requirement for facilitating and contributing towards delivery of an eastern access to Temple Meads Station applicable to all new development and if so, is this justified?

Council's response

101. The eastern entrance to Bristol Temple Meads Station is substantially complete and will open alongside the new university campus in Autumn 2026.

Q4.14 f) Are the requirements set out under the remaining place principles (design, mix of housing, connectivity, green infrastructure, and pedestrian and cycle links) and transport, and flood risk clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

102. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS3 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

103. As a large scale regeneration area with intentions for thousands of homes, the place principles appropriately indicate that residential developments should contribute towards an appropriate mix of housing types.

104. Regarding connectivity, the policy appropriately seeks to improve connectivity to surrounding communities, which is an acknowledged issue affecting this area.

105. The approach to green infrastructure and open space is consistent with policies BG1 and GI A, and is appropriate to the regeneration of this large area.

106. The approach to pedestrian and cycle links specifically relates to the bridging points along the western and southern parts of the area.

107. Regarding transport, the policy sets out the overall approach to transport improvements and the approach to parking provision. The approach would be supported by other relevant transport policies.

108. The flood risk section links to policy FR2 and refers to the comprehensive approach to mitigation. It also addresses the approach to the sequential test and Flood Risk Assessment.

109. Developments which have appropriately addressed the place principles, transport and flood risk alongside other relevant policies would be consistent with the local plan, having regard to paragraph 11 of the NPPF (September 2023).

110. Regarding design, the policy refers to having a form, scale and density consistent with a city centre location. For clarity and for consistency with policies UL1 and DC2, the place principle should be amended to state the following. This has been added to the schedule of suggested main modifications (EXA002):

Policy DS3, policy text, 'Place principles', first bullet, amend 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';

Policy DS4: Western Harbour

Q4.15: Is Policy DS4 justified, consistent with national policy and effective? In particular:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the area and is it a suitable area for being part of the Development Strategy?

Council's response

111. Policy DS4 is an enabling policy that explains that the area will be comprehensively developed as a city quarter. It states the uses which will be included. Most of the area is in the ownership of Bristol City Council.

112. A regeneration project is in progress⁴, with a consultation on a draft masterplan expected shortly. It is appropriate that this policy is included in the local plan as a key regeneration project that forms part of the development strategy for the city.

113. The council's responses to PQ37 (EXA0024) referred to the road system and PQ38 referred to two sites within the area which have received planning permission.

Q4.15 b) Will the policy be effective in achieving a reconfigured road system for the area and is this approach justified?

Council's response

114. The policy does not directly achieve a reconfigured road system but is one of the aspects of development under Policy DS4. There is a need to update or replace the Cumberland Basin road system which is an important local and regional transport route. The Western Harbour regeneration project is an opportunity to make

⁴ [Western Harbour regeneration](#)

wider improvements to the area at the same time and which has the potential to make use of any space created by changes to the road system.

Q4.15 c) Is there an anticipated housing capacity for this area and if not, why not? To be effective, should the policy identify the expected level of housing delivery in this area?

Council's response

115. The policy, supported by the proposed masterplan, provides an effective approach to enabling new homes as envisaged by the policy.

116. Policies DS4 provides the strategic policy for the regeneration of Western Harbour as a mixed and inclusive community with new homes.

117. The policy does not indicate a numerical capacity or target. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS4 states that development will include new homes with a mix of types, sizes and tenures. The SHLAA anticipates a delivery of 320 homes from parts of the regeneration area that have planning permission. For the remainder of the area, a masterplan is considering the approach to development. This is expected to be published shortly and will indicate the potential appropriate scale of housing development, having considered in detail the relationship of development with the area's environmental and heritage assets. Pending the outcome of this process, delivery in excess of the 320 homes anticipated by the SHLAA is not required to meet the local plan housing requirement, and any further delivery in Western Harbour would contribute towards the aspiration to exceed it as set out in policy H1.

Q4.15 d) Is the boundary shown on the diagram at page 28 of the Plan appropriately defined?

Council's response

118. The policy area encompasses the area of the proposed Western Harbour masterplan and adjoining development opportunities to the east at Baltic Wharf and Payne's Shipyard. It includes the area of the road system referred to in the policy.

119. The image on page 28 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 24 'Page 24 Clifton Village, Hotwells and Ashton Gate' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS4 shown at the centre.

120. The policy area is also illustrated on the geographical diagram for Central Bristol on page 13.

Q4.16: Are the requirements set out in Policy DS4 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Will the Place principles be effective in achieving the aspirations for the area?

Council's response

121. The place principles complement the aspirations set out for the area. Taken as a whole, the policy provides a means to secure development that meets those aspirations.

Q4.16 b) Are the place principles for Western Harbour consistent with Policy CHE1 and national policy in respect of heritage assets?

Council's response

122. The policy advises that proposals will have regard to the area's important heritage assets and respond appropriately to key views and landmarks set out the relevant Conservation Area Character Appraisals and other supporting policy and guidance.

123. This approach appropriately reflects national policy and operates in the context of policy CHE1 which addresses the approach to individual proposals / heritage assets.

124. In response to representations made by Historic England, a modification to include reference to the Brunel's Swing Bridge (see image below), an important historic asset that is on the Heritage at Risk register is considered appropriate to ensure that it is appropriately addressed as part of the regeneration of the area.

125. The Brunel's Swing Bridge is located beside the Cumberland Basin North Entrance Lock underneath and adjacent to the Plimsoll Swing Bridge (A3029). The Register explains that it has been redundant and decaying on the dock since the construction of Plimsoll Bridge in the twentieth century and that the bridge is still in need of extensive repairs and a sustainable use.



© Historic England

A main modification is suggested to DS4 and its explanation text:

Under 'place principles' in policy wording - add a final bullet point:

Have regard to the conservation and enhancement of the Grade II* listed Brunel's Swing Bridge.

After paragraph 3.1.38 add new paragraph:

3.1.38A The Grade II* listed Brunel's Swing Bridge is presently identified on the Historic England Heritage at Risk Register. Acknowledging this current status Policy DS4 expects development to have regard to its conservation and enhancement as part of the development of the area.

Q4.16 c) In respect of flood risk, there are two separate parts in the policy which set out different requirements. Is this justified and will it be effective?

Council's response

126. The policy requirements are complementary and are not in contradiction to each other. The place principle deals with place-related matters and the 'Flood risk' section deals with technical flood risk matters.

Q4.16 d) Are the requirements set out under the remaining place principles (access) and housing mix and transport clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

127. Regarding access, the policy approach in relation to access to waterways is consistent with policy BG5. The approach to pedestrian and cycle links appropriately seeks to improve connectivity to surrounding communities, which is an acknowledged issue affecting this area. Specific areas are referred to in the policy.

128. As a large scale regeneration area with intentions for homes, the policy appropriately indicates that residential developments should contribute towards an appropriate mix of housing types.

129. Regarding transport, the policy sets out the overall approach to transport improvements and the approach to parking provision. The approach would be supported by other relevant transport policies.

130. Developments which have appropriately addressed the place principles, housing mix and transport alongside other relevant policies would be consistent with the local plan, having regard to paragraph 11 of the NPPF (September 2023).

Policy DS5: Frome Gateway

Q4.17: Is Policy DS5 justified, consistent with national policy and effective? In particular:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

Council's response

131. Policy DS5 is an enabling policy that explains that the area will be comprehensively developed as a new mixed-use neighbourhood. It states the uses which will be included.

132. The policy is supported by a regeneration framework. The Frome Gateway Spatial Regeneration Framework was endorsed and published in January 2024 (EXA011).

Q4.17 b) Is the anticipated housing capacity of 1,000 set out in paragraph 3.1.42 justified? To be effective, should the policy identify the expected level of housing delivery in this area?

Council's response

133. Policy DS5 provides the strategic policy for the regeneration of Frome Gateway⁵.

134. The estimated capacity set out at paragraph 3.1.42 reflects the intentions for the area as set out in the Frome Gateway Spatial Regeneration Framework (EXA011).

135. This level is consistent with development of an area of this scale at the minimum densities indicated through policies UL1 and UL2 and generally with making best use of previously developed land alongside the development of other uses.

136. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS5 as drafted sets out that development will include new homes with a mix of types, sizes and tenures and that development will have a density consistent with a city centre location. Taken together, the policy, its explanation and the approved framework provide an effective approach to enabling the number of homes envisaged. Should the opportunity arise to exceed the estimated 1,000 homes referred to, the policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

Q4.17 c) Are the 500 bedspaces for student accommodation justified?

Council's response

137. Regarding student accommodation the policy cross refers to Policy H7. For the Frome Gateway area H7 makes provision for 500 additional student bed spaces.

138. The approach is justified. It enables a significant contribution to meeting the identified need for student housing of 500 bed spaces. This is consistent with NPPF which expects local plans to address a range of housing needs. The policy also enables an appropriate balancing of such provision with the need to deliver other forms of new homes, mixed use developments and mixed and balanced communities consistent with national planning policy and the wider objectives and intentions of the regeneration area.

Q4.17 d) Having regard to the Old Market Neighbourhood Development Plan, is the Policy DS5 justified, and will it be effective in delivering the aims of the Neighbourhood Plan and the aspirations of the Policy DS5?

⁵ [Frome Gateway regeneration](#)

Council's response

139. Within the part of the policy DS5 area that overlaps with the Old Market Quarter Neighbourhood Development Plan (NDP) (EXA005), the policies and guidance set out in the NDP will continue to apply alongside policy DS5. The aims of policy DS5 are not in conflict with the aims of the NDP.

140. An excerpt of the neighbourhood plan Policies Map is shown below. The policy DS5 area incorporates development sites ES1-4, WS1-2 and WS4 (allocated by policy C6 of the NDP), a longer term development site adjacent to the River Frome (not a policy allocation) and also a Principal Industrial and Warehousing Area (PIWA) (addressed by policy B5 of the NDP but reflecting that designated at the time by the Bristol Central Area Plan (DPD003)). The Policies Map also shows a safeguarded cycle/pedestrian route linking Eugene Street with a possible new crossing over the River Frome.

141. In relation to the PIWAs designated by the Bristol Central Area Plan, the approach in policy DS5 takes forward the aims of the Neighbourhood Development Plan, which are for incremental change. As stated in section 7.2.5 of the NDP:

“The Neighbourhood Plan supports the principal function of the PIWA’s (see Map 5: Policies) and recognises their positive impact on the area through provision of local employment. However, the community also recognises the negative impact that warehousing can have on the vibrancy and attractiveness of the area. The plan therefore supports and augments the approach set out by Bristol City Council in policy DM13 of the Site Allocation’s and Development Management Policies document for a more flexible approach to the PIWAs.

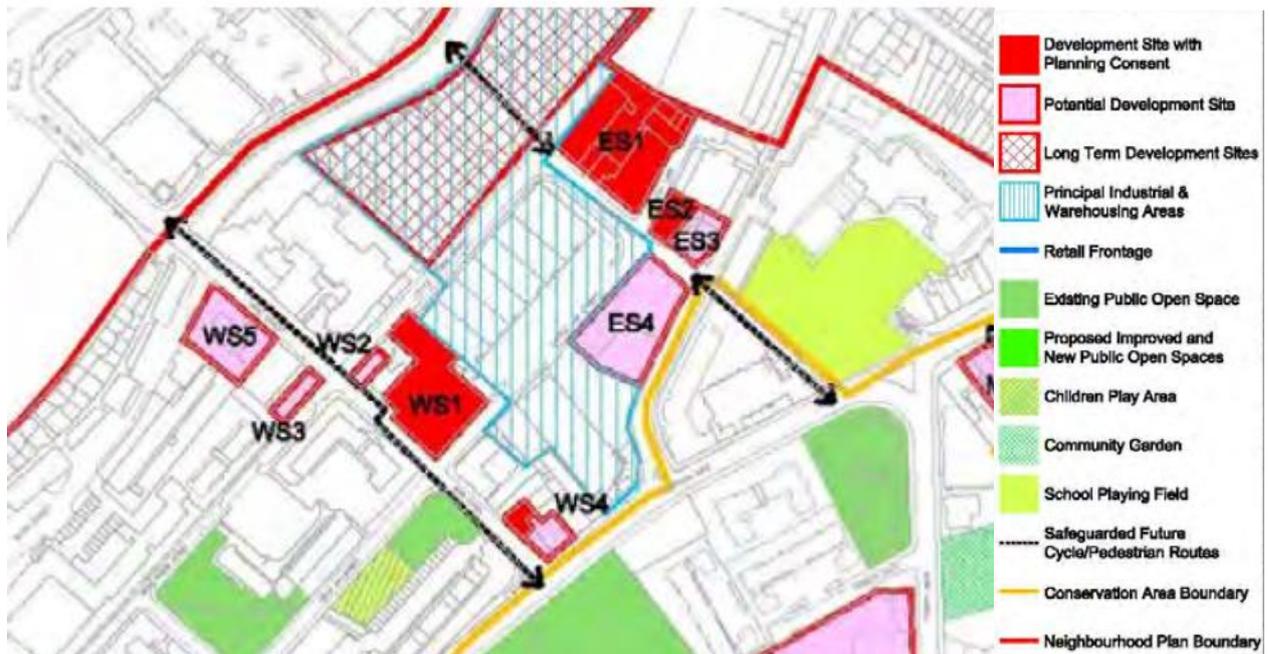
“In Old Market Quarter, this means creating the opportunity for changes on the edges of PIWAs, particularly on Midland Road/Kingsland Road and possibly on Clarence Road, Stapleton Road, Little Ann Street and Little George Street where re-development may be appropriate if it can deliver certain benefits. The plan therefore supports the approach set out by Bristol City Council in the Central Area Plan for development along Midland Road.”

142. In relation to the development sites, these are subject to site specific development guidance in Appendix 1 of the NDP. The suggested mix of uses are:

- ES1, ES3, WS1: Residential and commercial
- ES2: Residential
- ES4, WS2, WS4: Not specified

143. The mix of uses proposed by policy DS5 and further explored by the agreed development framework for Frome Gateway is in conflict with the proposals set out in the NDP.

144. The safeguarded cycle / pedestrian route shown in the NDP aligns with the St. Paul’s Green Link designated by policy BG7 of the local plan, which is also reflected in policy DS5 and the agreed development framework which proposes a new bridge in this location.



Q4.17 e) Is the boundary shown on the diagram at page 31 of the Plan appropriately defined?

Council's response

145. The policy area incorporates the existing site allocation KS09 (which it supersedes) and further development opportunities to either side of the River Frome. It coincides with the Frome Gateway Spatial Regeneration Framework.

146. The image on page 31 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 21 'Page 21 Ashley Down, St. Werburghs, Easton and Eastville (west)' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS5 shown at the centre.

147. The policy area is also illustrated on the geographical diagram for Central Bristol on page 13.

Q4.17 f) Is the aspiration to deliver logistics provision adjacent to the M32 J3 justified, and will the policy be effective in this regard? What evidence is there on its potential impact on the M32?

Council's response

148. As set out in the council's response to PQ40 (EXA024) the reference reflects proposals for logistics provision on a site adjacent to Junction 3 as set out in the Frome Gateway Spatial Regeneration Framework (EXA011).

149. The existing local plan designates the site and a wider area to the south as a Principal Industrial and Warehousing Area which is accessed from the M32 via

Pennywell Road. At present the proposed logistics site is occupied by a wholesale distribution business.

Q4.18: Are the requirements set out in Policy DS5 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Are the requirements relating to Newfoundland Way and the underpass (bullets 3,4,5 and 6) justified and will they be effective?

Council's response

150. The requirements continue and develop existing approaches set out in policies BCAP39 and BCAP24 (DPD003). They also reflect the Frome Gateway Spatial Regeneration Framework (EXA011).

Q4.18 b) In respect of housing provision i) is the mix of homes set out in paragraph 3.1.43 justified and ii) is the need for accessible and adaptable homes justified and is it consistent with Policy H9? Is there a need for the policy to reflect both these requirements.

Council's response

151. The policy states that the area should contribute to an appropriate mix of housing types. These are discussed in paragraph 3.1.43 and are further addressed in the Frome Gateway Spatial Regeneration Framework (EXA011).

Q4.18 c) Are the requirements set out under the remaining place principles (design, pedestrian and cycle links, mixed uses, green infrastructure) and transport and flood risk, clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

152. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS5 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

Issue 4.3: Are the policies relating to East Bristol justified, effective and consistent with national policy?

Policy DS6: Lawrence Hill

Q4.19: Is Policy DS6 justified, consistent with national policy and effective? In particular:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

Council's response

153. Policy DS6 is an enabling policy that explains that the area will be developed for a mix of residential, workspace and community uses. It states the uses which will be included.

154. The policy refers to a regeneration framework which will co-ordinate the approach to development.

155. The council's response to PQ42 (EXA0024) refers to the bus depot and PQ43 discusses the roundabout.

Q4.19 b) Is the boundary shown on the diagram at page 35 of the Plan appropriately defined?

Council's response

156. The policy area reflects a cluster of development potential identified as part of the urban potential assessment (EVEH02), focused on underused land around the Lawrence Hill roundabout, Lawrence Hill Station and Lawrence Hill Local Centre.

157. The image on page 35 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 26 'Page 26 Temple Quarter, Lawrence Hill and Totterdown' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS6 shown at the centre.

158. The policy area is also illustrated on the geographical diagram for East Bristol on page 34.

Q4.19 c) Is the anticipated housing capacity of 1,500 set out in paragraph 3.2.8 justified? To be effective, should the policy identify the expected level of housing delivery in this area?

Council's response

159. Policy DS6 provides the strategic policy for the regeneration of Lawrence Hill.

160. The estimated capacity set out at paragraph 3.2.8 is consistent with the scale of potential in this area, informed by the urban potential assessment (EVEH02) and SHLAA (EVEH01).

161. This level is consistent with development of an area of this scale at the minimum densities indicated through policies UL1 and UL2 and generally with making best use of previously developed land alongside the development of other uses.

162. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS6 as drafted sets out that development will include new homes with a mix of types, sizes and tenures and that development will have a density consistent with the location. Taken together, the policy, its explanation and the approved framework provide an effective approach to enabling the number of homes envisaged. Should the opportunity arise to exceed the estimated 1,500 homes

referred to, the policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

Q4.19 d) Is it clear how a decision maker should react to any proposals which suggest that the bus depot at dc2 is no longer required?

Council's response

163. As set out in the council's response to PQ42 (EXA024).

Q4.20: Are the requirements set out in Policy DS6 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Is the approach to tall buildings consistent with Policy DC2 and is it justified within this area?

Council's response

164. The policy indicates that tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development. This relates to and is consistent with Policy DC2 which indicates that the area is a location where tall buildings may be appropriate.

Q4.20 b) Are the requirements set out in bullets 1, relating to Croydon Street and Lawrence Hill Station and bullet 2 relating to improved pedestrian cycle links justified?

Council's response

165. The policy appropriately seeks to improve connectivity to surrounding communities, which is an acknowledged issue affecting this area.

Q4.20 c) Are the requirements set out under the remaining place principles (design, density, active ground floor uses, reconfiguration of Lawrence Hill roundabout) and transport, workspace and flood risk, clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

166. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS6 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

Policy DS7: Central Fishponds

Q4.21: Is Policy DS7 justified, consistent with national policy and effective? In particular:

a) *Is the policy sufficiently clear in defining what uses would be acceptable within the area?*

Council's response

167. Policy DS7 is an enabling policy that explains that the area will be developed for a mix of residential, workspace and community uses. It states the uses which will be included.

168. The policy refers to a regeneration framework which will co-ordinate the approach to development.

169. Planning permissions for housing-led mixed-use development have been granted in this area and further proposals are under consideration.

Q4.21 b) *Is the boundary shown on the diagram at page 38 of the Plan appropriately defined?*

Council's response

170. The policy area reflects a cluster of development potential identified as part of the urban potential assessment (EVEH02), focused on underused land around the Fishponds Town Centre, encompassing and superseding some site allocations from the existing local plan.

171. The image on page 38 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map pages 22 'Page 22 Eastville (east), Whitehall and Speedwell' and 23 'Page 23 Hillfields' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS7 shown at the centre.

172. The policy area is also illustrated on the geographical diagram for East Bristol on page 34.

Q4.21 c) *Is the anticipated housing capacity of 1,500 set out in paragraph 3.2.16 justified? To be effective, should the policy identify the expected level of housing delivery in this area?*

Council's response

173. Policy DS7 provides the strategic policy for the regeneration of Central Fishponds.

174. The estimated capacity set out at paragraph 3.2.16 is consistent with the scale of potential in this area, informed by the urban potential assessment (EVEH02) and SHLAA (EVEH01).

175. This level is consistent with development of an area of this scale at the minimum densities indicated through policies UL1 and UL2 and generally with making best use of previously developed land alongside the development of other uses.

176. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS7 as drafted sets out that development will include new homes with a mix of types, sizes and tenures and that development will have a density

consistent with the location. Taken together, the policy, its explanation and the approved framework provide an effective approach to enabling the number of homes envisaged. Should the opportunity arise to exceed the estimated 1,500 homes referred to, the policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

Q4.21 d) Is it clear how a decision maker should react to any proposals which suggest that the bus depot at Easton Road is no longer required?

Council's response

177. See Policy DS6: Lawrence Hill above.

Q4.22: Are the requirements set out in Policy DS7 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Is the approach to tall buildings consistent with Policy DC2 and is it justified within this area?

Council's response

178. The policy indicates that tall buildings in the right setting and of the right design may be appropriate as part of the overall approach to development. This relates to and is consistent with Policy DC2 which indicates that tall buildings may be appropriate where specified in relation to specific regeneration areas. The area is identified as a town centre and has public transport and active travel connections.

Q4.22 b) Are the place principles for the area consistent with Policy CHE1 and national policy in respect of heritage assets?

Council's response

179. The policy states that development will the scale and design of development will take account of the Stapleton and Frome Valley conservation area, which covers a limited part of the area but adjoins the northern part of the area. This approach appropriately reflects national policy and operates in the context of policy CHE1 which addresses the approach to individual proposals / heritage assets.

Q4.22 c) Are the requirements set out in bullet 1, relating to Goodneston Road justified?

Council's response

189. The policy appropriately seeks to improve connectivity to surrounding communities.

Q4.22 d) Paragraph 3.2.18 refers to densities of 100 dph and that higher densities may be acceptable in some circumstances, is this approach justified and will it be effective?

Council's response

190. The stated policy approach is to make the efficient use of land. The densities suggested in paragraph 3.2.18 reflect the potential for comprehensive forms of development in this area and is consistent with the objectives of the policy and the area's town centre location.

Q4.22 e) Are the requirements set out under the remaining place principles (design, active uses, and transport, workspace and housing mix, clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

191. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS7 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

Issue 4.4: Whether the policies relating to South Bristol are justified, effective and consistent with national policy.

The following questions relate to policies DS8 and DS9. Issues relating to policies DS10 to DS12 are addressed under Matter 6: Green Belt.

Policy DS8 – Central Bedminster

Q4.23: Are the requirements set out in Policy DS8 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

Council's response

192. Policy DS8 is an enabling policy that explains that that the area will be developed for a mix of residential, workspace and community uses. It states the uses which will be included.

193. The policy is supported by regeneration frameworks. The Whitehouse Street Regeneration Framework was endorsed and published in March 2023 (EXA013).

194. A number of developments are under construction within the area, particularly within the area covered by the Bedminster Green Place-making Framework (EXA012).

Q4.23 b) Is the policy sufficiently clear in defining what uses would be acceptable within the Central Bedminster area?

Council's response

195. See response to Q4.23(a) above.

Q4.23 c) Is the boundary shown on the diagram at page 43 of the Plan appropriately defined?

Council's response

196. The policy area encompasses the Bedminster Green and Whitehouse Street framework areas plus other development potential identified as part of the urban potential assessment (EVEH02), including underused land around Bedminster Station and Bedminster Town Centre.

197. The image on page 43 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 25 'City Centre, Redcliffe and Bedminster (north)' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS8 shown at the centre.

198. The policy area is also illustrated on the geographical diagram for South Bristol on page 42.

Q4.23 d) Is the anticipated housing capacity justified. To be effective, should the policy identify the expected level of delivery in this area?

Council's response

199. Policy DS8 provides the strategic policy for the regeneration of Central Bedminster.

200. As set out in the SHLAA report (EVEH01) the estimated capacity in Central Bedminster arises from a combination of approved development frameworks – notably the Whitehouse Street Regeneration Framework (EXA013) – and other known development proposals and urban potential.

201. This level is consistent with development of an area of this scale at the minimum densities indicated through policies UL1 and UL2 and generally with making best use of previously developed land alongside the development of other uses.

202. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS8 as drafted sets out that development will include new homes with a mix of types, sizes and tenures and that development will have a density consistent with Central Bedminster's town centre location, noting that city centre style densities may be appropriate subject to a co-ordinated approach to development which delivers quality urban design. Taken together, the policy, its explanation and the approved frameworks provide an effective approach to enabling the number of homes envisaged. Should the opportunity arise to exceed the estimated 3,500 homes referred to, the policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

Q4.23 e) Further to the above, what extent of the policy area is subject to flood risk and how has this been considered in terms of the suitability of the area for growth and the capacity to accommodate additional development?

Council's response

203. As set out in Appendix 1 of this response statement (prepared in response to Q4.27(f) below), the Central Bedminster area is 49% in Flood Zone 2, 9.1% in Flood Zone 3 at present and 22% in Flood Zone 3 with 100 years' climate change.

204. The level of development proposed for the area can be accommodated while taking account of flood risk. In the area covered by the Whitehouse Street Regeneration Framework (EXA013) this has been considered in relation to the mix and distribution of uses. In the area covered by the Bedminster Green Place-Making Framework (EXA012), flood risk has been taken into account in the planning permissions that have been granted. A restoration project for part of the River Malago is being taken forward as part of the response to flood risk in the area.

Q4.23 f) Are the proposed housing densities justified and, to be effective, should they be set out in policy?

Council's response

205. The stated policy approach is to make the efficient use of land. The densities suggested in paragraph 3.3.11 reflect the potential for comprehensive forms of development in this area and are consistent with the objectives of the policy and the area's town centre location in the inner urban area close to Bristol City Centre. It is well connected by public transport and active travel modes.

Q4.23 g) Is the figure of 1,600 student bedspaces a requirement? If so, on what basis is this justified?

Council's response

206. Regarding student accommodation the policy cross refers to Policy H7. For the Central Bedminster area H7 makes provision for 1,600 additional student bed spaces. For proposals which would result in this provision being exceeded (in circumstances where this is supported by area specific guidance or where no guidance exists), H7 states that any proposals for purpose built student accommodation should then meet the policy criteria for 'other locations' set out in policy H7. These include forming part of mixed use developments comprising a proportion of other compatible residential uses, not resulting in a local imbalance, not conflicting with other planning objectives and where relevant providing a contribution towards affordable housing.

207. The approach is justified. It enables a significant contribution to meeting the identified need for student housing of 1,600 bed spaces allowing this to be exceeded in specified circumstances. This is consistent with NPPF which expects local plans to address a range of housing needs. The policy also enables an appropriate balancing of such provision with the need to deliver other forms of new homes, mixed use developments and mixed and balanced communities consistent with national planning policy and the wider objectives and intentions of the regeneration area.

Q4.23 h) Is it clear how a decision maker should react to individual development sites being expected to 'contribute appropriately to the delivery

of mixed uses and supporting infrastructure, services and facilities as set out in this policy and the regeneration frameworks'?

Council's response

208. The policy aims to ensure that individual development sites contribute to the wider intentions for the area. In applying the policy approach, regard will be had to the relevant regeneration framework where one is in place.

Q4.23 i) Under Flood Risk, would the scope of the sequential test only be expected to be within the defined policy area? If so, would this be consistent with national policy and with Policy FR1?

Council's response

209. The sequential test is only expected to be applied within the policy area. This is consistent with the approach taken in other development strategy policies.

Q4.23 j) Are the requirements set out under the remaining place principles, transport, workspace and housing mix headings clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

210. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS8 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

Policy DS9 – Brislington

Q4.24: Are the requirements set out in Policy DS8 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

Council's response

211. Policy DS9 is an enabling policy that explains that the area will be developed for a mix of residential, workspace and community uses. It states the uses which will be included.

212. The policy refers to a regeneration framework which will co-ordinate the approach to development.

Q4.24 b) Is the boundary shown on the diagram at page 45 of the Plan appropriately defined?

Council's response

213. The policy area reflects a cluster of development potential identified as part of the urban potential assessment (EVEH02), including underused land around Bath Road, encompassing and superseding some site allocations from the existing local plan.

214. The image on page 45 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 32 'Brislington (south)' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS9 shown at the centre.

215. The policy area is also illustrated on the geographical diagram for South Bristol on page 42.

Q4.24 c) Is the anticipated housing capacity justified? How would the additional 450 dwellings referred to in paragraph 3.3.14 be achieved and how has this been factored into overall delivery assumptions?

Council's response

216. Policy DS9 provides the strategic policy for the regeneration of Brislington.

217. The baseline capacity of 500 homes set out at paragraph 3.3.14 is consistent with the findings of the urban potential assessment (EVEH02). It is this figure of 500 homes that contributes to Bristol's overall housing capacity as set out in the SHLAA (EVEH01).

218. The potential for around 450 additional dwellings could arise from more comprehensive approaches of development subject to site availability. The additional potential is not required for the delivery of the spatial strategy.

Q4.24 d) To be effective, should the policy identify the expected level of delivery in this area?

Council's response

219. Policy DS9 provides the strategic policy for the regeneration of Brislington.

220. This level of development referred to is consistent with development of an area of this scale at the minimum densities indicated through policies UL1 and UL2 and generally with making best use of previously developed land alongside the development of other uses.

221. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS9 as drafted sets out that development will include new homes with a mix of types, sizes and tenures and that development will have a density consistent with the location. Taken together, the policy and its explanation provide an effective approach to enabling the number of homes envisaged. The policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

Q4.24 e) Are the proposed housing densities justified and, to be effective, should they be set out in policy?

Council's response

222. The stated policy approach is to make the efficient use of land. The densities suggested in paragraph 3.3.16 reflect the potential for comprehensive forms of development in this area and are consistent with the objectives of the policy and the area's location as a regeneration area on a major public transport corridor.

Q4.24 f) Are the requirements set out under the remaining place principles, transport, workspace and housing mix headings clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

223. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS9 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

Issue 4.5: Whether the policies relating to North Bristol justified, effective and consistent with national policy.

Policy DS13 - Lockleaze

Q4.25: Are the requirements set out in Policy DS13 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the Lockleaze area?

Council's response

224. Policy DS13 is an enabling policy that explains that the area will be developed for a mix of new homes. It states the uses which will be included.

225. The policy reflects a regeneration project that has been ongoing for several years. A number of sites have been completed or are under construction.

Q4.25 b) Is the boundary shown on the diagram at page 56 of the Plan appropriately defined?

Council's response

226. The policy area reflects a regeneration project that has been ongoing for several years, with the addition of further development opportunities to the south and west identified by the urban potential assessment (EVEH02).

227. The image on page 56 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development).

228. The boundary of the policy area is formally shown on the submission policies map page 14 'Horfield (north) and Lockleaze' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS13 shown at the centre.

229. The policy area is also illustrated on the geographical diagram for North Bristol on page 55.

Q4.25 c) Is the anticipated housing capacity justified? To be effective, should the policy identify the expected level of delivery in this area?

Council's response

230. The policy reflects a regeneration project that has been ongoing for several years. A number of sites have been completed or are under construction. As with other regeneration areas, the policy approach is considered effective in enabling delivery in the area.

Q4.25 d) Are the proposed housing densities justified and, to be effective, should they be set out in policy?

Council's response

231. The stated policy approach is to make the efficient use of land. The densities suggested in paragraph 3.4.10 are consistent with the objectives of the policy and the area's location as a regeneration area.

Q4.25 e) Are the requirements set out under the remaining place principles, transport, workspace and housing mix headings clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

232. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS13 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

Policy DS14 – Central Southmead

Q4.26: Are the requirements set out in Policy DS14 justified, consistent with national policy and would they be effective in securing sustainable development? In particular with regard to:

a) Is the policy sufficiently clear in defining what uses would be acceptable within the Central Southmead area?

Council's response

233. Policy DS14 is an enabling policy that explains that the area will be developed for a mix of affordable homes, private housing and community uses. It states the uses which will be included.

224. The council's response to PQ50 (EXA024) refers to the community plan and a recent planning permission.

Q4.26 b) Is the boundary shown on the diagram at page 58 of the Plan appropriately defined?

Council's response

225. The policy area reflects a regeneration project that is being progressed in partnership with the local community, centred on Glencoyne Square.

226. The image on page 58 is a general illustration of the policy area using aerial photography (which may be updated on adoption to reflect on-going development). The boundary of the policy area is formally shown on the submission policies map page 7 'Brentry and Southmead (north)' where the policy area is illustrated with horizontal orange hatching bounded by an encompassing black line, and with the policy number DS14 shown at the centre.

227. The policy area is also illustrated on the geographical diagram for North Bristol on page 55.

Q4.26 c) Is the anticipated housing capacity justified? How would the additional 450 dwellings referred to in paragraph 3.3.14 be achieved and how has this been factored into overall delivery assumptions?

Council's response

228. The estimated capacity reflects the development proposed in the Southmead Community Plan.

(Second half of the question repeats Q4.24(c) and relates to Brislington)

Q4.26 d) To be effective, should the policy identify the expected level of delivery in this area?

Council's response

229. Policy DS14 provides the strategic policy for the regeneration of Central Southmead.

230. This level of development referred to is consistent with development of an area of this scale at the minimum densities indicated through policies UL1 and UL2 and generally with making best use of previously developed land alongside the development of other uses.

231. Policy H1 sets out the local plan housing requirement, with an aspiration to exceed it. Policy DS14 as drafted sets out that development will include new homes with a mix of types, sizes and tenures and that development will have a density consistent with the location. Taken together, the policy and its explanation provide an effective approach to enabling the number of homes envisaged. The policy approach would not unduly constrain additional housing development by appearing to set a fixed capacity within or beyond the plan period.

Q4.26 e) Are the proposed housing densities justified and, to be effective, should they be set out in policy?

Council's response

232. The stated policy approach is to make the efficient use of land. The densities suggested in paragraph 3.4.14 are consistent with the objectives of the policy and the area's location as a regeneration area.

Q4.26 f) Are the requirements set out under the remaining place principles, transport, workspace and housing mix headings clear and unambiguous such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?

Council's response

233. The place principles address overall principles for the design and form and response of development to its economic, social and environmental context. In policy DS14 they aim to ensure certain forms of development are encouraged. The place principles reflect and work with other policies within the local plan that cover the issues in more detail.

Issue 4.6: Whether the proposed site allocations are justified taking into account the reasonable alternatives, effective in terms of deliverability and consistent with national policy in enabling sustainable development?

The site selection methodology is set out in TPC001⁶. The responses to PQ13 to PQ18 and SPQ4 to SPQ7 provide some further information as to the Council's approach to site selection, including how specifically transport, flooding and biodiversity matters had been taken into account. It also provides further information relating to how extant allocations in existing plans have been carried forward into the Plan.

In response to PQ14 the Council provided the Bristol City Council – Local Plan Testing outputs report⁷. This is a report by AtkinsRealis relating to transport modelling.

Q4.27: Are the proposed allocations identified by policies DS11, DS12, E4 and DA1 justified as appropriate when considered against reasonable alternatives and would they be consistent with national policy? In particular:

a) Does the evidence demonstrate that the sites have been selected based on a robust, consistent and objective basis? What criteria were used to identify suitable sites and are the reasons for selecting some sites and rejecting others clearly set out and justified?

Council's response

Green Belt release sites - Policy DS11: Development Allocations – south west Bristol; Policy DS12: New neighbourhood – Bath Road, Brislington

⁶ TPC001 – Allocations and Designations Process Topic Paper (April 2024)

⁷ EXA024a

234. The council response to PQ51 and PQ52 (EXA024) addresses this element of the question and notes, 'The West of England Combined Authority Strategic Green Belt Assessment September 2022 (EVEG01) provides an assessment of the Green Belt having regard to its purposes. The assessment assists in providing an understanding of the impact of the proposed changes.'

235. In addition land within the Green Belt, DS11B Land at Yew Tree Farm, Bridgwater Road is included in the SA (CSD004) as a reasonable alternative, as it is a site discounted since the Draft Local Plan March 2019.

Policy E4: Avonmouth Industrial Area and Bristol Port

236. The council response to PQ99 (EXA024) addresses the question.

Policy DA1: Proposed Development Allocations

237. The Allocations and Designations Topic Paper (TPD001) outlines the approach to the sites allocated by policy DA1. This is expanded upon in the responses to PQ13 (EXA024), SPQ4 and SPQ6 (EXA036), which demonstrate that the sites have been selected on an appropriate basis which is robust, consistent and objective.

238. Section 4 of Appendix 4 of the SA (CSD004d) notes the reasonable alternatives to the site allocations which include:

- Proposed draft site allocations discounted from the Local Plan since the Draft Local Plan March 2019 Consultation version;
- Existing adopted site allocations no longer progressed; and,
- Some Call for Sites, not supported for allocation, which would otherwise not have a supportive policy context.

239. The sustainability appraisal (CSD004) also explains the Bristol context, noting at 3.1 that it is 'because as a largely urban area, with an emphasis on redevelopment of previously developed land and where there are few undeveloped sites, there are fewer genuinely reasonable alternatives than may be available elsewhere.'

Q4.27 b) Transport Issues

In terms of highways, have the individual and cumulative effects on the transport network been robustly assessed?

Council's response

240. This question is addressed by the council's response to PQ14 (EXA024).

Q4.27 c) What transport infrastructure, or other mitigation schemes, have been identified that would address any identified transport issues? Has the likely effectiveness of proposed transport mitigation schemes been assessed?

Council's response

241. The spatial strategy encourages urban living across the city, with a focus on brownfield land, in well-designed, connected and accessible neighbourhoods which limit the need for private travel. Policies relating to areas of growth and regeneration include the requirement for development to be supported by transport improvements.

242. Policy DS12: New neighbourhood – Bath Road, Brislington includes the expectation that development is supported by appropriate local and strategic

transport infrastructure and the provision of land along the A4 frontage to allow for a mass transit/walking and cycling corridor.

243. Where specific issues relating to the development allocations in policy DA1 have been identified, development considerations have been included outlining detailed requirements.

244. In addition, policy T2 states that the council will support the delivery of significant improvements to transport infrastructure and sustainable travel measures to provide an integrated transport system, specifically listing a proposed mass transit network and expanded metrobus network. Policy T2A safeguards land required for potential future transport and movement infrastructure and safeguards rail sites and transport depots.

245. The council response to PQ14 (EXA024) details the approach with regard to transport and cites the primary message from the WERTM modelling exercise undertaken 'is that adding additional housing and jobs (associated with the local plan) does not lead to a proportionate increase in highway trips across the network; the majority of the extra trips are made using sustainable modes of transportation.'

246. The council does not consider there to be any unacceptable impacts on highway safety or that residual cumulative impacts on the road network would be severe (NPPF September 2023 paragraph 111). If development is proposed where there is evidence of such impacts, the policies of the local plan are sufficiently robust to ensure effective mitigation.

Q4.27 d) Are there any outstanding concerns on transport matters (either individually or cumulatively) from National Highways or any other relevant transport authority?

Council's response

247. Representations from National Highways address these matters. Bristol City Council is the highways authority for Bristol. No other representations have been maintained by transport authorities of neighbouring areas.

***Q4.27 e) Flooding and drainage issues
Has the selection of sites, and the spatial strategy, been informed by a Strategic Flood Risk Assessment based on up-to-date flood risk data and climate change allowances, taking advice from the Environment Agency?***

Council's response

248. Flood risk topic paper (TPC002) explains how the selection of sites and the spatial strategy were informed by the SFRA based on up-to-date flood risk data and taking advice from the Environment Agency. Indeed, some sites were removed following the 2019 consultation due to unresolved flooding issues as noted in the council's response to PQ13/14 (EXA024).

249. Appendix 1 to this response statement updates the tables from Appendix 1 of the topic paper with additional information on flood risk with climate change.

Q4.27 f) Has a sequential risk-based approach been taken to identifying the spatial strategy and specific allocations, as required by paragraph 161 of the NPPF? Are any locations identified for growth within Flood Zones 2 and 3? If so, has the exception test been carried out and are the conclusions justified?

Council's response

250. The specific development allocations largely avoid areas at risk of flooding, which is only possible due to the significant contribution to Bristol's capacity made by the areas of growth and regeneration. This is expanded upon in the answer to PQ13/14 (EXA024) and in the Flood risk topic paper (TPC002).

Policies DS1 – DS14 Spatial strategy

251. PQ13/14 'The risk of flooding has informed the spatial strategy for the city, which proposes to locate development predominantly in areas with a lower risk of flooding and avoids further greenfield development on the functional floodplain. The areas of regeneration all promote regeneration on previously developed land, as an alternative to meeting Bristol's housing requirement on greenfield land within and beyond the city. They make an essential contribution to meeting Bristol's housing requirement and, in turn, its best effort to meet its housing need in accordance with the NPPF.'

252. The flood risk topic paper (TPC002) explains that whilst the sequential test is usually applied over a whole local authority area, in the areas of growth and regeneration, it is appropriate to restrict the search area for the sequential test to the regeneration area in question. It also notes that this approach has been established by the Bristol City Council Flood Risk Sequential Test Practice Note (August 2013), which was prepared in consultation with the Environment Agency, and is reflected in the emerging development strategy policies for the areas of growth and regeneration.

Policy DA1 Site Allocations

253. As detailed in Flood risk topic paper (TPC002), the following sites are wholly or partly within Flood Zones 2 or 3. Appendix 1 to this response statement updates the tables from Appendix 1 of the topic paper with additional information on flood risk with climate change; this is reflected in the table below.

BDA1201	16-20 Fishponds Road, Eastville	Housing-led mixed uses with flexible workspace	100% FZ2 51% FZ3 100% FZ3 (climate change)
BDA1401	Previously developed land at Hartcliffe Way, Bedminster	Housing-led mixed uses with flexible workspace	99% FZ2 0% FZ3 6% FZ3 (climate change)
BDA2801	Land to the south of Blackswarth Road, St George	Housing-led mixed uses with flexible workspace.	2.4% FZ2 2.5% FZ3 23% FZ3 (climate change)

BDA2902	Works at Felstead Road, Southmead	Housing-led mixed uses with flexible workspace	70% FZ2 41% FZ3 75% FZ3 (climate change)
BDA0801	The Grove Car Park, The Grove and Prince Street, Harbourside	City centre uses, including housing	100% FZ2 100% FZ3 100% FZ3 (climate change)
BDA0802	Land at Redcliffe Way	Residential led growth, supported by a mix of uses on appropriate sites	67% FZ2 41% FZ3 89% FZ3 (climate change)
BDA2102	Maritime Heritage Centre Public Car Park, Gas Ferry Road	Residential-led mixed use	74% FZ2 18% FZ3 100% FZ3 (climate change)

254. The council has considered all reasonably available sources of housing land in determining Bristol's capacity, and as such the development of homes on these sites is considered to pass the sequential test.

255. The latter 3 have no specific number of homes assigned to them and all three sites are mixed-use allocations that offer the opportunity to apply the sequential approach within the site boundary and locate more vulnerable uses on upper floors or (where possible) on parts of the site that are less at risk of flooding. They will make an important contribution to the ongoing regeneration of Bristol City Centre as set out in policy DS1 of the emerging local plan.

256. A further 2 sites are within flood zones where the proportion of the site affected is not significant (BDA0702 Land at Marmalade Lane (south), Brislington; BDA2401 Bridge Farm, Land at South Hayes, Eastville) and another site has planning permission and hence the sequential test has already been determined (BDA0302 Land to the west of Ashton Gate Stadium, Marsh Road / Winterstoke Road, Ashton Gate).

257. The topic paper is clear that where required, the exception test will be applied at the planning application stage, when the proposed development would be assessed in detail.

Q4.27 g) Notwithstanding specific questions relating to Policy FR2, to what extent is the spatial strategy and delivery of housing and employment dependent on the delivery of the Bristol Avon Flood Strategy? What status does this project have and what is the delivery timescale?

Council's response

Employment development:

258. In relation to employment development, there is little to no dependency on the Bristol Avon Flood Strategy (BAFS). Employment development typically takes the

form of 'less vulnerable' land uses (NPPF Annex 3) that are compatible with areas at risk of flooding subject to appropriate site-specific Flood Risk Assessments (NPPG 'Flood Risk and Coastal Change' Table 2).

Housing development:

259. The flood risk sequential test referred to the council's responses to Q4.27(e-f) above has been carried out in relation to undefended flood zones and, as such, is not dependent on the delivery of BAFS.

260. In relation to the exception test and the requirement for site-specific Flood Risk Assessments, the future delivery of flood defences will play an enabling role on land at risk of flooding from the river Avon throughout central Bristol, but sites that benefit from the proposed flood defences will still be expected to address residual flood risk.

261. In specific regard to the sites allocated for development by policy DA1, there is no dependency on BAFS in relation to the spatial strategy or the wider delivery of housing. As set out in the council's responses to Q4.27(e-f) above, the development allocations within the city centre that fall within Flood Zone 3 now or with climate change have no specific number of homes assigned to them. The final development allocation in Flood Zone 3 that would directly benefit from BAFS, BDA2801 (Land to the south of Blackswarth Road, St George), received a committee resolution to grant planning permission for new homes in January 2025.

262. The greatest dependency on the delivery of BAFS occurs within two areas of growth and regeneration, those covered by policies DS3 (St. Philip's Marsh) and DS4 (Western Harbour).

263. As set out in the council's response to Q4.15(c), there is no specific housing capacity set or assumed for Western Harbour (other than on the two sites that have planning permission at Baltic Wharf and Payne's Shipyard). Consequently, while the delivery of new homes in Western Harbour would be dependent to some extent on the delivery of BAFS, the spatial strategy and the wider delivery of housing are not affected.

264. The plan also does not assign a specific housing number to St. Philip's Marsh, but a capacity of 4,000 homes is assumed for the area in the SHLAA (EVEH01). The spatial strategy does depend on development in this area to a certain extent, as the non-delivery of the entire 4,000 homes would marginally exceed the 'headroom', or excess capacity over and above the proposed housing requirement, that has built into the SHLAA.

265. However, the council has been able to approve some development in the St. Philip's Marsh area ahead of the completion of the planned flood defences. In recent permissions for purpose-built student accommodation (PBSA) granted on Albert Road, applicants' Flood Risk Assessments have been required to demonstrate safety up to 2040, beyond which they have been able to rely on BAFS (subject to appropriate provisions for residual risk). This is due to the advanced status of the strategy, as set out below. As part of the planning process, sites that front the River Avon have been required to deliver their part of the flood defences proposed by BAFS.

266. Of the remaining areas of growth and regeneration in central Bristol, DS1A (Bristol City Centre – Broadmead, Castle Park and the Old City) is subject to flood risk that can be managed on a site-by-site basis. DS2 (Bristol Temple Quarter) has already been progressed substantially through the grant of planning permissions,

and the flood risks affecting DS5 (Frome Gateway) arise principally from the River Frome. Development in these areas is therefore not dependent on BAFS.

Status and delivery timescale of BAFS:

267. The project's Outline Business Case secured Environment Agency Chief Executive approval in July 2024, with Defra Investment Committee endorsement to continue to Full Business Case preparation shortly afterwards. The council is currently preparing to issue a tender package for the full business case, detailed design and consenting work which is anticipated to commence late summer 2025. The council has secured a significant funding package for this work including £10m of Bristol City Council reserves funding, £10m of West of England Combined Authority funding, and £2m of funding from the Regional Flood and Coastal Committee.

268. Timescale for delivery is largely driven by the council's preferred consenting route of a Transport and Works Act order and the need for extensive public and statutory stakeholder engagement and consultation. The council's ambition is for construction work to commence in 2030, completing around 2035. The council is also taking opportunities for quick win delivery as it arises. Two such examples are the consented PBSA schemes in St Philip's Marsh that incorporate sections of the proposed flood defences within the development proposals' red line boundaries, which are expected to be delivered in advance of the wider flood scheme.

Other delivery mechanisms:

269. It is not possible to rely on all riverside development coming forward and delivering flood defences in kind in a timeframe suitable for completion of the entire scheme within the plan period, and the council also recognises the risk of viability challenges associated with this approach. As such, the Outline Business Case identifies a flood defence solution that can be delivered in land within the council's control. While the council's aspiration is for wider multifunctional flood defence infrastructure incorporated into areas of growth and regeneration, this 'backstop' solution is in place to ensure that the scheme can deliver in a suitable timeframe. The council, supported by the Environment Agency, continues to work closely with master planning teams to manage these interfaces and monitor the timing of this solution being implemented.

Q4.27 h) Other matters

How were effects on air quality and the presence of air quality management areas (AQMA) taken into account in site assessment? Are any allocated sites within an AQMA and how does the Plan ensure such development would be acceptable?

Council's response

270. Sites were assessed by pollution control specialists. Sites identified as being with AQMAs or having specific air quality issues include a development consideration requiring an air quality assessment or requiring consideration of air quality.

271. A Clean Air Zone was introduced in Bristol in November 2022, designed to achieve compliance with annual objectives for NO₂ pollution in the quickest time possible as directed by government. The Clean Air Zone is projected to achieve legal

compliance and the One City Plan 2023 sets goals to reduce pollution below the legal requirement.

272. In addition, policies HW1: Pollution control and water quality and HW2: Air quality require sensitive development in areas of pollution to include measures to mitigate the impact on future occupiers.

Q4.27 i) How were the effects on open space and green infrastructure assessed? For example, on what basis was it determined that some allocations did not need to be retained as part of the City's green infrastructure / open space provision?

Council's response

273. Consultation with landscape, parks and nature conservation specialists informed by the evolving Parks and Green Spaces Strategy 2024-39 (REL008) was undertaken as part of the site selection process.

274. 86% (81 of the 94) site allocations are on previously developed land. Only 7 of the newly allocated sites are on greenfield land. 2 are currently in recreation use (BDA1301 Stapleton Road Cricket Club and 1302 Land south of Rose Green Close, Clay Hill) and in these allocations development is subject to the provision of alternative land for recreation or the land not being required for sport or recreation. The remaining 5 sites are not open spaces (4 are inaccessible and 1 is extended road verge (BDA0702 Land at Marmalade Lane)). All of these sites were assessed by the parks team and landscape colleagues who did not identify a need for additional open space within these areas.

275. Affected retained allocations sites went through a similar process as part of the Site Allocations and Development Management Policies Local Plan and the Bristol Central Area Plan, some of which were identified for development by the local decision making neighbourhood partnerships that were in operation at the time of production of the previous local plan.

Q4.27 j) Were other factors such as the effect on landscape character, biodiversity and heritage appropriately taken into account as part of the site selection process?

Council's response

276. This is addressed in the council's response to PQ13/14 (EXA024).

277. With regard to the effect on heritage it is noted that assessments were carried out in line with the 5 steps set out in Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans. As such the following steps were undertaken:

- The heritage assets affected by a potential site allocation were identified;
- The contribution the site makes to the significance of the heritage asset was understood;
- The impact the allocation might have on that significance was identified;
- Consideration was given to maximising enhancements and avoiding harm; and

- The proposed site allocation's appropriateness in light of the NPPF's tests of soundness was determined.

Q4.27 k) How was appropriate mitigation for the impacts of development, individually and cumulatively, identified and is this adequately reflected in relevant policies?

Council's response

278. This is addressed in the council's response to PQ13/14 (EXA024).

Q4.27 l) Has the deliverability of allocations been appropriately assessed, having regard to infrastructure provision and other policy requirements?

Council's response

279. The deliverability of allocations been appropriately assessed, having regard to infrastructure provision and other policy requirements.

280. The sites came forward via a number of sources including a call for sites, a review of the council's assets, land use monitoring, surplus and likely to become surplus public sector land, and vacant and derelict land and buildings. The sites identified for potential allocation were subject to consultation in the 2019 Bristol Local Plan Review Annex – Draft Development Allocations Consultation (PCD002a) with a further opportunity to raise any deliverability issues during the 2022 Bristol Local Plan Review Draft Policies and Development Allocations Further Consultation (PCD003).

281. Policy requirements including development considerations are in line with government guidance contained in the NPPF and are not considered to negatively impact upon deliverability. Planning applications have been submitted, and development has commenced on a number of sites since the beginning of the local plan review.

282. Furthermore, the Bristol Local Plan Viability Assessment (August 2023) (EVEV01) assessed policies which were published as part of the Council's Regulation 18 consultation in 2019, taking account of additional policies with cost implications as set out in the submitted Bristol Local Plan Publication Version (November 2023) (CSD001).

283. The Planning Obligations Supplementary Planning Document (EXA023) was adopted on 27 October 2012 and took effect from 1 January 2013 upon the introduction of Community Infrastructure Levy in Bristol. The current SPD refers to policies in the Core Strategy (DPD001). The SPD will be updated for the adoption of the new Local Plan although the Bristol Local Plan Viability Assessment (EVEV01) was produced within the context of the existing SPD.

Q4.28: Is bringing forward extant allocations into this Plan justified? In particular, is it justified for these sites to have been considered and assessed separately, and differently, to other proposed allocations?

Council's response

284. This is addressed in the council's response to PQ17 (EXA024) and SPQ5 (EXA036).

285. The aim of the new local plan has been to add to the overall supply of land able to deliver new homes, rather than subtract from it. Unlike the site allocations newly proposed in the Bristol Local Plan (those with BDA prefixes), the sites brought forward from the current local plan (DPD002 and DPD003) have been, and continue to be, part of an adopted local plan. During the process of preparing the current local plan, the suitability of the land for the development proposed was established.

Q4.29: Further to the above, given development has not been implemented on these sites thus far, what assessment of likely implementation and delivery on these has taken place?

Council's response

286. The council's response to SPQ5 (EXA036) refers to fact that the allocations proposed to be carried forward in the 2019 local plan consultation were relatively recent having regard to the dates of adoption of the two current site allocations plans. The intended retention of the allocations formed part of the consultation process.

287. There was no evidence to indicate the retained sites would not be able to be developed within the plan period to 2040. No requests were received from landowners or site promoters who wished to see existing local plan site allocations removed.

288. The allocations remain consistent with national planning policy. 90% of the retained allocations (35) include an element of housing and most are on brownfield land.

290. The site allocations retained from the existing local plan are continuing to be implemented. 109 allocations which were proposed for retention in the 2019 local plan consultation were reduced to 39 in the Publication Version 2023 reflecting progress being made on delivery of a large number of the existing allocations over that period.

Appendix 1: Sites affected by flood risk - Q4.27(e - f)

The following tables from Appendix 1 of the Flood Risk Topic Paper (TPC002) have been updated to show more information on flood risk with climate change. The percentage of each site that is estimated to be subject to Flood Zone 3 with climate change has been calculated using the Bristol Level 1 Strategic Flood Risk Assessment (EVEF01), 'Sequential Test, 2120 Flood Zone 3' map.

Development Allocations (affected by flood risk)

Site	Area (Ha)	Allocation	Capacity	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
BDA0302 Land to the west of Ashton Gate Stadium, Marsh Road / Winterstoke Road, Ashton Gate	2.2	Mixed-use, which could include: offices, hotel, sports, leisure and housing.	None assigned	100%	2.3%	99%
	The sequential test has already been determined as part of planning permission 21/03165/F.					
BDA0702 Land at Marmalade Lane (south), Brislington	0.6	Housing	40	5.1%	0%	0%
	The allocation specifies that development should be sited appropriately within low-risk areas and as such there will be no development in Flood Zones 2 or 3.					

Site	Area (Ha)	Allocation	Capacity	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
BDA0801 The Grove Car Park, The Grove and Prince Street, Harbourside	0.5	Site would be considered appropriate for a number of city centre uses, including housing to create a more efficient use of land.	None assigned	100%	100%	100%
	No specific capacity is assigned to this complex city centre site, which therefore makes no specific contribution to meeting Bristol's housing requirement until such a time as it obtains planning permission.					
BDA0802 Land at Redcliffe Way	3.1	On appropriate sites the area would be suitable for residential led growth, supported by a mix of uses including offices, community infrastructure, leisure uses and culture / tourism uses, which may include hotel uses. An element of retail will be acceptable on appropriate sites subject to consideration of its impact on other designated shopping areas.	None assigned	67%	41%	89%
	No specific capacity is assigned to this complex city centre site, which therefore makes no specific contribution to meeting Bristol's housing requirement until such a time as it obtains planning permission.					

Site	Area (Ha)	Allocation	Capacity	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
BDA1201 16-20 Fishponds Road, Eastville	0.2	Housing-led mixed uses with flexible workspace, if no longer required in its current use.	20	100%	51%	100%
	Through mixed-use development more vulnerable uses can be directed to upper floors.					
BDA1401 Previously developed land at Hartcliffe Way, Bedminster	0.9	Housing-led mixed uses with flexible workspace, if no longer required in its current use.	55	99%	0%	6%
	Through site layout and mixed-use development more vulnerable uses can be directed to areas of the site that are not in Flood Zone 3 with climate change.					
BDA2102 Maritime Heritage Centre Public Car Park, Gas Ferry Road	0.8	Residential-led mixed use, if no longer required in its current use.	None assigned	74%	18%	100%
	No specific capacity is assigned to this complex city centre site, which therefore makes no specific contribution to meeting Bristol's housing requirement until such a time as it obtains planning permission.					
BDA2401 Bridge Farm, Land at South Hayes, Eastville	1.7	Self-build, custom housebuilding or community-led housing, with open space.	15	2.0%	0.3%	1.9%
	The proportion of the site at risk of flooding is not significant.					

Site	Area (Ha)	Allocation	Capacity	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
BDA2801 Land to the south of Blackswarth Road, St George	0.6	Housing-led mixed uses with flexible workspace.	75	2.4%	2.4%	23%
	Through mixed-use development more vulnerable uses can be directed to upper floors and/or areas of the site that are not in Flood Zone 3 with climate change.					
BDA2902 Works at Felstead Road, Southmead	0.3	Housing-led mixed uses with flexible workspace, if no longer required in its current use.	20	70%	41%	75%
	Through mixed-use development more vulnerable uses can be directed to upper floors and/or areas of the site that are not in Flood Zone 3.					

Green Belt Sites (all)

Site	Area (Ha)	Allocation	Capacity	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
DS11-1 Land at Ashton Gate	8.2	Housing	500	100%	9%	11%
	The sequential test has already been determined as part of planning permission 21/03166/P.					
DS11-2 Land at Elsbert Drive, Bishopsworth	3.5	Housing	150	0%	0%	0%
	The site is in Flood Zone 1.					

DS12 Bath Road, Brislington	30	Residential led mixed-use development.	750	2.0%	2.0%	2.0%
	The proportion of the site at risk of flooding is not significant.					

Avonmouth Site Allocations (all)

Site	Area (Ha)	Capacity	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
ASA001 Land at Kings Weston Lane (south)	27	N/A	88%	81%	94%
ASA002 Land at Kings Weston Lane (north)	5.7	N/A	100%	99%	100%
ASA003 Land east of Packgate Road	4.8	N/A	100%	99%	100%
ASA004 Land east of Chitting Road	18	N/A	100%	100%	100%
ASA005 Land south of Seabank Power Station	2.5	N/A	100%	100%	100%

Areas of Growth and Regeneration (all)

Site	Area (Ha)	Capacity (SHLAA)	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
DS1A Broadmead, Castle Park and the Old City	54	2,800	43%	0.8%	45%
	The sequential approach will apply at the planning application stage, directing more vulnerable development towards areas less at risk of flooding.				

Site	Area (Ha)	Capacity (SHLAA)	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
DS2 Bristol Temple Quarter	68	3,674	50%	41%	56%
	The sequential approach will apply at the planning application stage, directing more vulnerable development towards areas less at risk of flooding. Policy DS2 requires a sequential test to be carried out within the policy area.				
DS3 St. Philip's Marsh	69	4,627	63%	54%	68%
	The sequential approach will apply at the planning application stage, directing more vulnerable development towards areas less at risk of flooding. Policy DS3 requires a sequential test to be carried out within the policy area.				
DS4 Western Harbour	36	320	66%	62%	76%
	The sequential approach will apply at the planning application stage, directing more vulnerable development towards areas less at risk of flooding. Policy DS4 requires a sequential test to be carried out within the policy area.				
DS5 Frome Gateway	15	1,200	71%	37%	72%
	The sequential approach will apply at the planning application stage, directing more vulnerable development towards areas less at risk of flooding. Policy DS5 requires a sequential test to be carried out within the policy area.				
DS6 Lawrence Hill	56	514	0%	0%	0.2%
	The area is in Flood Zone 1.				

Site	Area (Ha)	Capacity (SHLAA)	% Flood Zone 2	% Flood Zone 3 (present day)	% Flood Zone 3 (climate change)
DS7 Central Fishponds	34	1,277	0%	0%	0%
	The area is in Flood Zone 1.				
DS8 Central Bedminster	53	4,067	49%	9.1%	22%
	The sequential approach will apply at the planning application stage, directing more vulnerable development towards areas less at risk of flooding. Policy DS8 requires a sequential test to be carried out within the policy area.				
DS9 Brislington	28	552	5.0%	2.8%	2.8%
	The proportion of the area at risk of flooding is not significant.				
DS13 Lockleaze	107	1,055	3.2%	2.4%	3.3%
	The proportion of the area at risk of flooding is not significant.				
DS14 Central Southmead	9.5	300	0%	0%	0%
	The area is in Flood Zone 1.				