

Examination of the Bristol Local Plan 2022-2040.

Historic England written statement 7 February 2025

Matter 13: Built Environment

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

Policy DC2: Tall Buildings

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

Matter 13 Q13.3 a) *Is the policy consistent with the NPPF at paragraph 126 in relation to achieving high quality beautiful and sustainable buildings, and paragraph 130 (a-e) in relation to planning policies and decisions?*

Matter 13 Q13.3 b) *Is the policy justified having regard to any evidence produced in support of the policy, and is this evidence up to date? Is the definition of tall buildings set out in paragraph 3.1.26 justified and will it be effective?*

Historic England response.

1. Clear and informed policy underpinned by evidence and amplified by local guidance and advice can help to shape an evolving cityscape. It can ensure a sympathetic response to Bristol's historic character, landmarks, heritage assets and important historic views from in and out of the city centre, and in doing so limit the risk of harm from inappropriate development.
2. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given great weight, and any harm to, or loss of, the significance of a designated heritage asset requires clear and convincing justification (NPPF paragraph 205).
3. NPPF paragraph 126 also acknowledges that being clear about design expectations, and how these will be tested is essential for achieving well designed places. NPPF paragraph 130 indicates that planning policies should ensure development is sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
4. With the above national policy context in mind, Historic England welcomes a commitment in Policy DC2 that tall buildings should not have a harmful impact by reason of inappropriate visual impacts over a wider area, including on the setting of heritage assets. However, in the forthcoming response we question whether this reassurance is sufficient.
5. Policy DC2 appears to consider Bristol's city centre (as a whole) as a suitable location in principle for tall buildings. The large geographical area of the defined city centre is

indicated in the map accompanying Policy DS1 on page 15 of the Local Plan. Pages 68 and 69 in Appendix C of the Urban Living SPD illustrate the expanse of this significant historic central area of the city and how its topography and relationship to the floating harbour accentuates its sensitivity.

6. As a consequence, the local authority may wish to clarify, whether there is, or needs to be, adequate evidence to help inform where in the city centre tall buildings may or not be appropriately located to ensure, for example, that local character and history, including the surrounding built environment and landscape setting is safeguarded (NPPF paragraph 126 and 130).
7. Historic England's tall building guidance is included in [Historic England Advice Note \(HEAN\) 4](#). Its purpose is to support those considering tall building proposals within the legislative and planning framework relevant to the historic environment. It highlights the value of a plan-led approach to tall buildings and at Page 11 provides a checklist summarising the main considerations for tall building policy, taking account of the historic environment including in relation to local plan evidence.
8. It considers that tall building policy should be underpinned by proportionate evidence to direct tall buildings to suitable locations where they make a positive contribution to the urban landscape and ensure potential harm to the significance of heritage assets is avoided or minimised. It states that Policy be informed by a heritage impact assessment, views analysis, and existing conservation area appraisals. It would be helpful if the local authority were able to confirm if such evidence has been gathered.
9. We note that Policy DC2 expects proposals for tall buildings to be consistent with the Urban Living SPD. Part 3 (Tall Building) of the SPD and specifically Q3.1 - 3.3 provides a steer on how the location and design of tall buildings in Bristol should be considered in the context of its heritage.
10. To inform a well-located tall building, part 3 of the Urban Living SPD recommends that proposals come forward as part of a spatial strategy for the wider area, as advocated by HEAN4. The SPD refers to the preparation of spatial strategies (or spatial frameworks) being informed by techniques such as urban characterisation studies and building height studies to provide evidence to support a local height definition for tall buildings and the identification of appropriate locations for tall buildings.
11. In our Regulation 19 response, Historic England enquired whether the local authority considered it was reasonable or appropriate for prospective developers of tall buildings to provide such information on an individual basis rather than by being prepared by the local authority as part of plan making; mindful of the requirement for development to be plan-led (NPPF paragraph 15).
12. We also asked whether, if there was an absence of an overall vision or strategy for tall buildings in the city centre, would it be a challenge, especially for decision makers, to

consider the cumulative effects of successive individual proposals on the cityscape over a period of time.

13. Consequently, we sought the local authority's position on whether it felt it might be appropriate, as part of the plan making process, to produce any missing evidence.
14. Historic England recognise the importance of being a constructive participant in the plan making process, and at each stage of the Local Plan's preparation we have presented positive suggestions and advice to the local authority; we hope these have been helpful. Nevertheless, mindful of the above, we appreciate there are a number of outstanding issues for the local authority and Inspectors to consider, and within this context we have again explored potential means of resolution.
15. We believe that local authority is currently preparing a city design guide and an updated heritage strategy (Our Inherited City) that we understand will provide a further level of planning guidance to inform, amongst other things, the location, form and design of tall buildings in support of the Local Plan Policy DC2. Historic England welcome preparation of such planning guidance.
16. We understand this would also amplify guidance in the Urban Living SPD providing a more thorough understanding of, and means to respond to, the significance of Bristol's historic skyline, its fundamental viewpoints, and individual heritage assets. If so, this may provide a positive response to the above concerns and a suitable reference(s) in the Local Plan may in turn help underpin/justify Policy DS1, DS1A and DC2 demonstrating a sound planning document that has been positively prepared and able to help inform the delivery of sustainable development.
17. If this were the case, Historic England is available to further engage to agree a position.

Matter 13 Q13.3 c) *The policy allows for tall buildings in the Inner Urban Area, Bristol City Centre, Temple Quarter and St Philip's Marsh or as identified in policies for specific regeneration areas, and not elsewhere within the City area? Is this approach justified?*

Historic England response.

In our response to Q13.3 b), mindful of the size and expanse of the city centre, we asked whether the local authority considered it was reasonable to identify all of the city centre as an area suitable, in principle, for tall buildings?

Whilst the development of tall buildings can have positive impacts upon an area, particularly if they are part of a wider regeneration scheme. Equally, there will be sites where the impacts upon the historic environment cannot be overcome or minimised. Such areas of the city centre may be inherently unsuitable for tall buildings due to the harm they would cause to the significance of heritage assets, such as certain conservation areas.

Matter 13 Q13.3 d) *Will it be clear to the decision maker how they should react to proposals for tall buildings brought forward under Policy DC2 particularly with regard to bullets (i) to (iv) in the second paragraph of the policy, and the fourth paragraph relating to being accompanied by sufficient information?*

Historic England response.

We have addressed this question in our response to Q13.3 b) and consider the current preparation of a city design guide and an updated heritage strategy (Our Inherited City) may help clarify to the decision maker how they should react to proposals for tall buildings with regard to visual impacts over a wider area, including on the setting of heritage assets.

Matter 13 Q13.3 e) *In response to PQ155 the Council have suggested a modification to Policy DPM1 where it refers to Landscape and Visual Impact Assessments. Is this proposed change necessary for soundness. Is the requirement to produce a Landscape and Visual Impact Assessment as part of a planning application for a tall building justified?*

Historic England response.

Although Policy DC2 requires proposals for tall buildings to be accompanied by sufficient information on which to assess their impact, it is not explicit and defers to the Urban Living SPD. However, this does not specify the need to provide a Landscape and Visual Impact Assessment (LVIA), or indeed, a Heritage Impact Assessment (HIA).

Historic England therefore agrees that the requirement to produce a LVIA as part of a planning application for a tall building is justified as, importantly, they can help provide a clear understanding of how a tall building sits within its landscape context. However, an LVIA will not consider the impact of a tall building on the significance of a heritage asset(s). As this is an important consideration, if a LVIA is required Historic England would suggest (strongly recommend) that it is reasonable and appropriate to also require a Heritage Impact Assessment (HIA).

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Word count 1,642