

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

Matter 17: Individual Site Allocation Policies

This statement sets out the council's response to the Inspectors' matters, issues and questions regarding individual site allocation policies 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.

Responses to Inspectors' questions

Issue 17.1: Whether the individual allocations are justified, consistent with national policy and the development requirements be effective in securing a sustainable form of development?

The Council's response to PQ169 sets out the Council's position on the status of the Development Allocations Annex. This suggests a continuation of the approach adopted under the current development plan.

Q17.1: Are Policy DA1, and the development requirements set out in the Annex clear and unambiguous about the scale and nature of development that is expected to be delivered?

Council's response

1. Policy DA1 indicates that the sites set out in the Development Allocations annex are identified as being suitable for development for the uses identified and in accordance with the accompanying development considerations and with all other relevant development plan policies. The introduction to the Development Allocations annex states that 'For those sites with a proposed housing allocation, an estimated number of homes which could be developed on the site is normally provided.' As such the development allocations provide information about the scale and nature of development that is expected to be delivered.

2. Each development allocation includes a proposed allocation which details the use or uses to be developed. On sites currently in employment use in appropriate locations, many housing allocations allow for an element of compatible workspace.

3. The allocations are therefore considered to be clear about the nature of development that is expected to be delivered, whilst allowing for a degree of flexibility to respond to a changing context and avoid being unnecessarily prescriptive.

4. The introduction to the Development Allocations annex advises that 'Once adopted, the precise number of homes to be developed will be determined through the planning application process, in accordance with the Urban Living Supplementary Planning Document and all relevant local plan policies.' This reflects the likelihood of their being more than one appropriate design solution for each development site.

5. 10 of the allocations where there are complex considerations and or mix of uses are not accompanied by an estimated housing capacity. This allows for a flexibility in the balance of uses on a site and avoid undue prescription. In these cases the site allocation establishes the suitability in principle of the site for the identified use or uses. 8 of these are sites brought forward from the current local plan including 7 in the city centre.

Q17.2: To be effective, should the development requirements set out in the Development Allocations Annex be set out clearly in policy?

Council's response

6. The status and role of the Development Allocations Annex is the same as that of the Site Allocations Information Annex in the adopted Site Allocations and Development Management Policies Local Plan (2014) which has been effective in practice. This question is further addressed by the council's response to PQ169 (EXA024).

The following questions may be relevant to all sites. However, given the number of allocations, there is no need for the Council to address each 'general' question for each individual site. Rather, it would be acceptable for these matters to be considered more generally and for any specific examples to be brought to our attention. The questions below will however provide an indication of the types of issues likely to be discussed in any site-specific hearings.

Representors who wish to submit written hearing statements on specific sites should refer to the questions below and should indicate which site they are referring to in their response.

Q17.3: Is the amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

Council's response

7. Most sites allocated for housing include an estimated capacity. Where stated the amount of development proposed has had regard to constraints and addresses directly or through relevant policy links the provision of any necessary infrastructure. This is discussed further the Topic paper (TPC001).

Q17.4: Does the Plan provide sufficient detail on form, scale, access and quantity of development for each site?

Council's response

8. Policy DA1 states allocated sites will be developed in accordance with the accompanying development considerations and with all other relevant development plan policies. The development considerations and accompanying estimated capacities provide detail on form, scale, access and quantity of development for each site where appropriate. This level of detail is considered to be sufficient without being overly prescriptive.

Form and scale

9. Development considerations included in allocations note specific design issues that have been identified and require mitigation, such as impact upon the amenity of neighbouring residents or heritage impacts where considered appropriate specify form and scale.

10. This approach reflects that there is likely to be more than one appropriate design solution for each development site and that circumstances may change over time. As such it avoids being unnecessarily prescriptive thereby speeding up the delivery of homes. This approach to the scale of development is proportionate given the number of sites proposed for allocation during the local plan review process.

Access

11. The development considerations included with each allocation identify where specific access issues have been identified and mitigation measures where appropriate.

Quantity of development

12. Housing capacities are normally given on sites allocated for an element of residential development. The above response to question 17.3 expands on this. A small number of sites with complex issues do not include an estimated capacity.

13. The most allocations are for residential development or include an element of residential development as part of a mixed use scheme. There are also a number of sites that allow for residential development amongst other appropriate uses where the sites are in retail centre locations and as such would be suitable for a number of uses. This is considered to be a proportionate and practicable approach to enable development.

Q17.5: Is there any substantive evidence to suggest the site should not be allocated based on one or more of the following factors?:

- **biodiversity, in particular but not restricted to protected habitats and species;**
- **green infrastructure or agricultural land;**
- **landscape quality and character;**
- **heritage assets;**
- **strategic and local infrastructure including transport;**
- **the efficient operation of the transport network and highway safety.**
- **contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk;**
- **open space, recreational facilities and public rights of way;**
- **viability and delivery.**

Council's response

14. All sites have been assessed against the above issues with input from relevant specialists. This is further addressed by TPC001 Allocations and Designations Process Topic Paper (April 2024) and council responses to PQ13 and 14. It is also addressed by the matter 4 council statement to issue 4.6, notably the responses to question 4.27:

- b) and c) strategic and local transport infrastructure including and the efficient operation of the transport network and highway safety;
- e) flood risk and groundwater,

- h) air quality;
- i) green infrastructure, open space and recreational facilities;
- j) landscape quality and character, biodiversity and heritage; and
- l) viability and delivery.

15. None of the proposed allocated sites are on land identified as best and most versatile agricultural land (land in grades 1, 2 and 3a of the Agricultural Land Classification).

16. Other issues including strategic local infrastructure, contamination, water quality, noise pollution, odours, land stability, and public rights of way were also considered as part of the allocations process and addressed by development considerations where appropriate.

17. Appendix 1 gives a detailed response to this question in relation to the allocation BDA1501 – Land at College Road, Fishponds for 'Self-build, custom housebuilding or community-led housing. This is in light of the high number of representations received on this allocation.

Q17.6: In relation to the above, do the site-specific policies contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development? Are the site-specific development requirements effective?

Council's response

18. The council's response to PQ13, PQ14 and PQ169 (EXA024) addresses this issue, noting that Policy DA1: Proposed development allocations says that sites 'will be developed for the uses identified and in accordance with the accompanying development considerations and with all other relevant development plan policies.'

19. Where specific issues requiring safeguards or mitigation have been identified, greater detail has been included to achieve an acceptable form of development and give certainty to developers while avoiding being overly prescriptive.

Q17.7: What infrastructure is critical to the delivery of each site? Where contributions are specified, are they necessary and justified by the evidence base? Is the Plan sufficiently clear on how and when infrastructure provision will be required?

Council's response

20. The council's response to PQ61 relating to Policy IDC1: Development contributions and CIL further addresses this issue (EXA024).

21. Policy DA1: 'Proposed development allocations' says sites '*will be developed for the uses identified and in accordance with the accompanying development considerations and with all other relevant development plan policies.*' As such the plan is taken as a whole, and relevant policies regarding infrastructure and transport provision are relevant.

22. Most sites within policy DA1 are relatively small scale, with only 7 being for 100 homes or more, and do not result in specific identified requirements regarding infrastructure provision.

23. Where relevant, sites include detail of contributions that will be required. These fall into 4 categories:

- Access/transport improvements – These were established in consultation with transport colleagues.
- Public Realm Improvements – these are specified in a number of cases where relevant.
- Ecology improvements – these are identified where appropriate.
- Quayside Walkway – this is referred to for a number of relevant site allocations.

Appendix 1 - Q17.5 in relation to BDA1501 – Land at College Road, Fishponds

Proposed allocation - Self-build, custom housebuilding or community-led housing.

- biodiversity, in particular but not restricted to protected habitats and species;

The site is not located within an SNCI, Wildlife Corridor, Ramsar, SAC or SPA. Given this, it is considered that the application of Policy BG1: Green infrastructure and biodiversity in new development, Policy BG2: Nature conservation and recovery, and Policy BG3: Achieving biodiversity gains, which includes the requirement for biodiversity net gains would be appropriate to address this issue.

- green infrastructure or agricultural land;

The land is not best and most versatile agricultural land as defined by the NPPF. The wider area benefits from extensive Green Infrastructure. It is approximately 20metres from allotments to the north and approximately 110m from the open space, also to the north, in the adjacent development which opens up onto Oldbury Court Estate Open Space, a council owned park of approximately 45 ha included in the local plan for protection as a Local Green Space.

- landscape quality and character;

The site is located within an urban context and has not been identified as having landscape quality requiring special protection or mitigation. It has not been identified as a protected open space (Local Green Space or Reserved Open Space) as part of the review of open spaces (see Local Green Space and Reserved Open Green Space - Topic Paper, TPC005).

- heritage assets;

The site is within the Stapleton and Frome Valley Conservation Area and a development consideration has been included that development should take account of the Stapleton and Frome Valley Conservation Area. It is considered that a the estimated capacity of 20 homes has had regard to the character of the area.

It is also of note that land to the north and east also within this conservation area has recently been developed, delivering 215 new homes.

- strategic and local infrastructure including transport;

The development of the site for 20 homes has not been identified as requiring any specific local infrastructure including transport at this stage.

- the efficient operation of the transport network and highway safety.

A development consideration has been included requiring suitable access to the site, which considers the impact on the junction with Glaisdale Avenue and appropriate footway enhancements. In addition a planning application will be subject to the provisions of Policy T3A: Transport development management.

- contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk;

A very marginal proportion of the site has been identified as being at risk of surface water flooding. A development consideration has been included requiring the consideration of surface water mitigation. Specific issues of contamination, air and water quality, noise pollution, odours, land stability, or other sources of flood risk have not been identified.

- open space, recreational facilities and public rights of way;

The site has not been identified as a protected open space (Local Green Space or Reserved Open Space) as part of the review of open spaces as it is not considered to meet the criteria outlined in the Local Green Space and Reserved Open Green Space - Topic Paper (TPC005).

The wider area benefits from extensive Green Infrastructure. It is approximately 20metres from allotments to the north and approximately 110m from the open space in the adjacent development, also to the north, which opens up onto Oldbury Court Estate Open Space, a council owned park of approximately 45 ha included in the local plan for protection as a Local Green Space.

The site is bounded by a public right of way to the west. A development consideration has been included that development should support pedestrian links through the site including connections to this PROW.

- viability and delivery

The site is allocated for self-build, custom housebuilding or community led housing and as such should, where viable, be delivered primarily as affordable housing. The site is in council ownership it is considered to be viable and deliverable.