

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

### **Matter 8: Economy and Inclusive Growth**

This statement sets out the council's response to the Inspectors' matters, issues and questions regarding economy and inclusive growth 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 8.1: Whether policies E1 – E8 are justified, effective and consistent with national policy.***

***Policy E1: Inclusive economic development***

***Q8.1: Is Policy E1 justified, consistent with national policy and effective? In particular:***

***a) Is the requirement to submit and employment and skills plan, including the thresholds identified, justified, what purpose would they serve and how would they be managed?***

#### Council's response

1. The policy reflects an established approach which is already in operation in the city.
2. The Council's Corporate Strategy (2022–2027) contains a number of themes, one of which; Economy and Skills, aims to promote economic growth that builds inclusive and resilient communities, decarbonises the city and offers equity of opportunity. A key element of this theme is improving access to employment and supporting people to access good jobs whatever their formal level of qualification. The Council's recently approved Economic Strategy builds on this, with key delivery themes around unlocking skills for our future economy whilst curating, and by inference supporting the development of, thriving places.
3. The delivery of an Employment and Skills Plan for major residential and commercial developments delivered in the city is key to the implementation of the Employment and Skills theme. Therefore, it is important that all those involved in shaping the city including the council, developers and delivery partners play their part in maximising employment opportunities for local residents.
4. Bristol City Council require all major planning applications to commit to the submission, and implementation of a local Employment and Skills Plan (ESP) for the construction phase of the development at validation stage. The ESP will be secured through pre-commencement planning conditions and where appropriate, an End User ESP will also be required pre-occupation.

5. Building Bristol is a service led and supported by Bristol City Council to support local developers who are preparing planning applications so they can also create robust employment and skills plans. A Building Bristol Coordinator is on hand to support contractors and end employers with developing their plans and delivering (and hopefully exceeding) their agreed targets. By working with all major developments, there are also opportunities for shared events and campaigns to boost local recruitment. In addition, intelligence gained on employment and skills requirements will be fed into the planning of future skills and workforce development initiatives to be undertaken by Bristol City Council and partner agencies, thus supporting inclusive economic development. Further information is available on the [Building Bristol](#) website.

**Q8.1 b) Would the policy be effective in ensuring development enables access to employment and removing barriers to employment for local residents?**

Council's response

6. Building Bristol's vision is to tackle educational and economic inequality by working with developers, contractors and employers to plug local employment and skills support services into all major developments. As mentioned previously, intelligence gained via the process of agreeing Employment and Skills Plans will also be fed into the planning of future skills and workforce development initiatives to be undertaken by Bristol City Council and partner agencies, thus supporting further inclusive economic development.

**Policy E2: Economic development land strategy**

**The floorspace requirements set out in Policy E2 are addressed under Matter 3. The following considers the other elements of the policy.**

**Q8.2: Other than the floorspace requirements, are the remaining parts of Policy E2 justified, consistent with national policy and effective? In particular:**  
**a) The phrase "workspace" appears to be synonymous with office, industry and warehousing. If this is the case, what is the purpose of the 'Industry and Warehousing' section of the policy and how does this differ to the 'Development and renewal of workspace' section?**

Council's response

7. The key difference between the "Industry and distribution" and the "Development and renewal of workspace" section is the inclusion of the 4 site allocations at Avonmouth within the "industry and distribution" section. If it would improve clarity, then consideration could be given to the inclusion of this text after the bullet point on the Industry and distribution areas under the "Development and renewal of workspace" heading. The "Industry and distribution" section could then be deleted.

**Q8.2 b) Given the policy appears to relate to offices as well as industry and distribution, how does this policy relate to Policy E3?**

Council's response

8. This policy sets out the overall strategy for economic development land which includes office floorspace figures and potential general development locations whilst Policy E3 and the associated text provides further detail on the city's provision of offices and states that office use may be limited to use class E(g) (i) (or its equivalent) to ensure that new office provision is maintained.

***Policy E3: Location of office development***

***Q8.3: Is Policy E3 justified, consistent with national policy and effective? In particular:***

***a) Is the list of locations and approach to office development consistent with NPPF, with regard to main town centre uses, and other relevant Plan policies (for example, Policy SS4)?***

Council's response

9. In order to support regeneration objectives, the policy also makes provision for offices in appropriate locations such as St Philip's Marsh (which has existing office provision) and regeneration areas as part of mixed-use developments. Some of the regeneration areas include existing and established centres.

10. The list of locations and approach to office development as set out in Policy E3 is considered to be consistent with the NPPF, other relevant local plan policies (including the development strategy policies) and the Bristol Economic Strategy and development frameworks.

***Q8.3 b) The third bullet refers to offices as part of mixed-use schemes. Why would such development be restricted to mixed-use development only?***

Council's response

11. Regeneration will lead to the mixed-use development of an area to include homes, employment space and other necessary uses. Office floorspace may feature as part of the overall regeneration of an area of growth and regeneration, where appropriate and particularly where the area features a town, district or local centre. This may be as part of the mixed-use development of a site, or as a standalone development. A clarification of how the development strategy policies and Policy E3 relate would be beneficial and the council will consider a modification.

***Q8.3 c) What other areas have been identified as suitable for offices in other policies in the Plan, as set out in the fourth bullet point?***

Council's response

12. Policy DA1: Proposed development allocations contains sites which are identified as being suitable for uses which include offices. Policy E6A: New workspace within mixed use development seeks the provision of new workspace (which could include small scale office space) as part of mixed-use developments on land currently or recently used for business, industry or distribution.

**Q8.3 d) Is the policy sufficiently clear as to what constitutes smaller-scale development?**

Council's response

13. The reference to smaller scale reflects the wording in Policy E6A (New workspace within mixed use developments) and what may be provided in terms of office use as part of the mixed-use redevelopment of former business, industrial and distribution sites. Such sites may be fairly small in themselves and therefore, when they are redeveloped for mixed use the amount of office space proposed to be provided is likely to be small scale.

**Policy E4: Avonmouth industrial area and Bristol Port**

**Q8.4: Is Policy E4 justified, consistent with national policy and effective? In particular:**

**a) Is the area identified under E4 on the policies map justified?**

Council's response

14. The area identified on the policies map as Avonmouth Industrial Area and Bristol Port (E4) is largely the same as the area identified as Principal Industrial and Warehousing Areas (BCS8, DM13) in the Avonmouth area in the existing local plan. This area forms part of the Avonmouth Severnside Enterprise Area which is a regionally important location for industry and business. The Enterprise Area is essentially a locally set economic development designation – not a planning one – used to give higher profile to the location as a key employment and growth area, and is a tool used to attract inward investment. Nationally set legislation also allows us to retain 100% of the business rates growth in some of the enterprise area, for investment in projects to support economic growth.

15. Avonmouth is by far the City's largest industrial location and therefore, the designation of over 640 hectares of land for the retention, development and redevelopment of land for industrial, distribution, energy and port related uses is considered justified. The area identified includes both existing development, which may offer redevelopment potential over the plan period, and new allocations.

16. Market evidence and planning commitments highlighted in the Employment Land Topic Paper (TPC003) point to demand for space at Avonmouth. Over the period between 2006 to 2022 83% of all of the city's new industrial development had come forward at Avonmouth, with the majority of space coming forward there for storage and distribution.

17. The Council's economic development service is aware of strong market interest arising from the industrial, distribution and energy sectors, plus these and other sectors seeking to be located in close proximity to the Port of Bristol.

18. Government funding has been secured to develop a Local Industrial Decarbonisation Plan (LIDP). Avonmouth is a key area of focus both for measures to decarbonise industry but also to create new business opportunities in pursuit of this objective.

**Q8.4 b) Are the specific allocations justified? Have they been selected based on a robust methodology, having regard to all relevant constraints including transport, flooding and biodiversity?**

Council's response

19. This issue is addressed in the Council's response to PQ99 and PQ100 Inspectors Document IN2 (EXA024).

**Q8.4 c) Does the policy provide an effective basis for the consideration of any development proposals within the four allocations? Is it clear what scale or form of development would be expected?**

Council's response

20. This issue is addressed in the response to PQ99 and PQ100 Inspectors Document IN2 (EXA024).

21. The industrial and distribution site allocations can be viewed in the existing industrial context of the Avonmouth Industrial Area and Bristol Port and represent a continuation of the industrial and related functions of the area. The policy wording is clear that development will require appropriate mitigation to ensure the risk of flooding is appropriately addressed and does not add to flood risk elsewhere, should make efficient use of land and be consistent with the relevant policies in the plan and contribute appropriately towards the habitat mitigation measures proposed for the area. The policy allows for a range of scales and types within the industrial; and distribution description. Form would be influenced by the intended use and the industrial context. Scale is expected to relate to site size in the industrial context having regard to plot ratios and site-specific matters.

22. The potential of the 4 site allocations for development within the next 5 years was assessed by JLL as part of their Employment Land Review update in 2023 (EVEE02). They rated the likelihood of these sites being developed for industrial and distribution uses in the 5 year period as being between 60-100%, with 100% meaning highly likely. Excluding the land at Kings Weston Lane previously mentioned, JLL viewed the floorspace capacity of the 3 remaining allocations as being between 52,839-73,759 sq m depending on the density of development.

23. The largest of the site allocations 'Land at Kings Weston Lane, south of Access 18' was subject of a planning application after the site was identified as a draft development allocation in the local plan consultation of 2019 - Draft Policy E5 in that version (PCD002). Permission was granted in 2022 prior to the publication of the local plan, with various reserved matters and conditions matters continuing to be processed through 2023 and 2024.

24. Work is about to start on the above site for the construction of 5 no. new industrial and logistics units. This phase of development totals 42,000 sq m with the units delivering between 2,800-20,000 sq m of new employment floorspace. The new units will deliver in the region of 640 jobs at the operational stage, plus construction phase jobs and significant multiplier effects for the local economy. This phase of development is due for completion before the end of 2025.

**Q8.4 d) Does the policy provide an effective basis for the consideration of proposals for the redevelopment or intensification of existing floorspace?**

Council's response

25. The initial paragraph of the policy makes clear that the area is reserved for the "redevelopment of land" as well as for its retention and development. The policy text then outlines the uses that will be acceptable.

26. Consideration could be given to whether the inclusion of a heading "Efficient use of land" above the second paragraph under the current heading "Flood risk mitigation" would improve clarity and give greater prominence to the issue.

**Q8.4 e) Is identification of the E4 area for large scale renewable energy projects justified? Have all potential impacts been fully assessed and does the Plan provide an adequate framework for assessing and/or mitigating the impact of any development, especially in relation to biodiversity?**

Council's response

27. The existing local plan recognises the potential of Avonmouth for renewable energy projects (DPD001) and the approach continues and has evolved in the current plan to reflect the fact that the area has seen the development of renewable energy projects in recent years and subject to being consistent with other policies in the local plan remains a suitable location for renewable energy installations.

28. Policy E4 has been screened within the Habitats Regulations Assessment Appropriate Assessment (PAL005).

29. Policy NZC5 (Renewable energy and energy efficiency) provides the framework for assessing/mitigating the impact of any development and includes biodiversity. Reference to this policy is included within the wording in the second paragraph of Policy E4.

30. This issue is addressed in the Council's response to Q14.7 in the statement to Matter 14.

**Q8.4 f) Given the stated role and function of the Avonmouth and Bristol Port Area for industry and distribution, would there be any limits to the scale or location of energy related development that would be considered acceptable?**

Council's response

31. It will depend on the content and context of the proposed development and how the proposals conform to relevant policies in the plan but it is not intended that that extensive forms of renewable energy developments (solar farms) are sought in the industrial areas or allocations. A modification will be appropriate to clarify that extensive renewable energy developments (solar farms) are not sought in the industrial areas or allocations.

**Q8.4 g) Are the policy's references to flood risk consistent with policies FR1 and FR2 and the NPPF? Other than the allocations, would development proposals within this area be subject to the flooding sequential test?**

Council's response

32. The Policy's references to flood risk are consistent with Policy FR1 and the NPPF. Avonmouth is not an area to benefit from the Bristol Flood Risk Strategy and therefore, is not subject to the requirements of Policy FR2.

33. Development proposals within the Avonmouth area other than the site allocations would be subject to the flooding sequential test.

***Q8.4 h) The Council's response to PQ101 states that the role of Hallen Marsh the area is to mitigate the ecological effects of existing and committed development. Does this include mitigation for sites allocated under Policy E4? Is the policy clear as to the role and function of Hallen Marsh?***

Council's response

34. It is understood from paragraph 3.3.34 of the Avonmouth Severnside - Outline Development Strategy (April 2012 - Final Report) that Hallen Marsh provides mitigation for the sites allocated under Policy E4.

35. The ASEA Ecology Mitigation and Flood Defence Project Ecology – Avonmouth and Severnside Enterprise Area has provided the ecological mitigation in the form of the new wetland habitat at Hallen Marsh. This has been handed over to the City Council.

36. The development of the largest of the Avonmouth industrial site allocations 'Land at Kings Weston Lane, south of Access 18' provided a financial contribution which was used for off-site ecological mitigation at Hallen Marsh.

37. Detail in respect of the role and function of Hallen Marsh is provided in the response to PQ101 (EXA024). Consideration could be given to the inclusion of this information within the explanatory wording to Policy E4.

***Q8.4 i) The policy provides no indication as to what forms of development other than industry, distribution, energy or port-related may be considered acceptable within the designated area. Would it be justified and consistent with national policy, in particular paragraph 122, to exclude all other land uses?***

Council's response

38. The approach to the Avonmouth Industrial Area and Bristol Port set out in the policy is an evolution of the approach contained in the existing local plan. Existing uses, plus the area's proximity to key junctions on the national motorway network (providing east-west and north-south accessibility), rail links and the presence of the Port of Bristol serve to make the area a nationally and regionally important location for industry, distribution, energy and port related uses and the policy approach seeks to focus on these land uses. This approach is supported by market behaviour – JLL noted in their 2019 Employment Land Review (EVEE03) that Avonmouth was the most active sub-market for industrial space in the Bristol area and viewed that as likely to continue.

39. In the same evidence, and subsequent update in 2023 (EVEE02), JLL noted that demand for other employment uses, such as for office, was concentrated in centres and established out of town office markets, thus suggesting a very limited role for

Avonmouth in providing for these uses beyond providing necessary ancillary space and amenity uses needed to support the industrial, distribution, energy and port related uses already established there.

40. Their Employment Land Study 2019 (EVEE03) recommended that the council should seek to protect and support the ongoing expansion of Avonmouth by supporting the provision of these amenity uses through the emerging planning policy.

41. It is suggested that modifications are made to Policy E4 to state that in addition to the uses specified in the policy wording that ancillary facilities and services which support the functioning of the Avonmouth Industrial Area and Bristol Port are likely to be acceptable subject to other relevant development plan policies.

Chapter 7: Economy and inclusive growth, Policy E4: Avonmouth Industrial Area and Bristol Port, Policy Text, page 102 - insert following sub-heading and text after the final paragraph of the 'Flood risk mitigation' section:

Ancillary uses:

In addition to industry and distribution, energy and port related uses, the following uses are also likely to be acceptable within the Avonmouth Industrial Area and Bristol Port, subject to other relevant development plan policies:

- Ancillary facilities and services which support the functioning of the Avonmouth Industrial Area and Bristol Port, including childcare facilities, small scale retail uses, sandwich shops and cafes, provided they would not adversely impact on the viability and continued operation of existing industrial uses

42. Any development proposals including main town centre uses in the Avonmouth Industrial Area would be subject to assessment to determine appropriateness in this out of centre location and proposals would need to be determined on an individual basis as to whether they are acceptable in land use policy terms.

43. Planning permission has been granted for mixed commercial/industrial development which includes a hotel and a number of small-scale retail and commercial uses on land at the site allocation at Kings Weston Lane, south of Access 18.

***Policy E5: Industry and distribution areas***

***Q8.5: Is Policy E5 justified, consistent with national policy and effective? In particular:***

***a) Are the locations referred to in paragraph 7.36 justified?***

Council's response

44. The identification of land reserved for industrial, distribution and related uses within the local plan has been informed by evidence and the specified locations are therefore justified. These locations represent Bristol's core provision of industrial and distribution land and accommodate a wide range of sectors and need to be reserved for these uses to support a diverse and inclusive economy.

45. All of the proposed Industry and Distribution Areas cited are established industrial areas, that already provide a valuable contribution to the supply of industrial land in the city. JLL's evidence to the council on employment land provision emphasises the value of protecting industrial land in planning terms, to ensure its continued use as such whilst mitigating the threat of pressure for a change to alternative, potentially higher value uses. They also note that protection for industrial uses is a necessary means to encourage future, and potentially more dense, re-provision thus adding to the city's stock of industrial space.

**Q8.5 b) Is the policy consistent with paragraph 122 of the NPPF with regard to the assessment of changes in demand for land?**

Council's response

46. The designation of the Industry and Distribution Areas in Policy E5 has been based on an evidence base which shows a demand for industrial land. The development strategy in the local plan identifies some areas for change and development which were safeguarded in the existing local plan for industrial and warehousing use (Policy DM13: Development proposals on Principal Industrial and Warehousing Areas (DPD002)). The sites reserved for industrial, distribution and related uses in Policy E5 represent Bristol's core provision of industrial and distribution land and accommodate a wide range of sectors and need to be reserved for these uses.

47. The policy does seek to permit other uses which are broadly complementary and in the main unlikely to hamper the effective functioning of areas for industrial and distribution uses.

48. Policy in the existing local plan permitted the development of leisure uses in industrial areas. In light of the evidence pointing to high demand for industrial space, the scope for leisure uses was not included within Policy E5 in order to prioritise a focus on industrial uses.

49. Regular monitoring of demand and supply (including planning completions and commitments) will be undertaken over the plan period, to help inform the continued validity of the designations (DPD002)). The sites reserved for industrial, distribution and related uses in Policy E5 represent Bristol's core provision of industrial and distribution land and accommodate a wide range of sectors and need to be reserved for these uses.

**Q8.5 c) The uses listed in the four bullet points are "likely to be acceptable". The policy also states that development must comply with criterion ii. Is the policy sufficiently clear about the circumstances in which alternative development would be acceptable?**

Council's response

50. The policy intends that any acceptable uses as listed must not adversely impact on the viability and continued operation of existing industrial uses. This could be clarified by merging i) and ii) to read *...unless the development is for a use referred to above and would not adversely impact on the viability and continued operation of existing industrial uses.*

**Q8.5 d) Are there any circumstances where uses other than those listed in the four bullet points would be considered acceptable?**

Council's response

51. Policy H5 (Self-build and community-led housing) sets out the circumstances where community led housing would be permitted on underused land or sites within Industry and Distribution Areas (Policy E5 'Industry and Distribution Areas').

**Policy E6A: New workspace within mixed use development**

**Policy E6A states that proposals for redevelopment of vacant or underused sites and premises currently or recently used for business, industry or distribution should include provision for new workspace as part of mixed-use developments.**

**Q8.6: Is Policy E6A justified, consistent with national policy and effective? In particular:**

**a) Is the policy sufficiently clear as to the circumstances in which new workspace provision should be delivered? For example, if a proposal is for residential only rather than mixed-use, would the policy seek new workspace provision?**

Council's response

52. The intention of the policy is that proposals for redevelopment of vacant or underused sites and premises currently or recently used for business, industry or distribution should be mixed use and include provision for new workspace.

53. As the text in paragraph 7.37 states, the council considers it is important that diversity of use and opportunities for business and employment are maintained or enhanced.

**Q8.6 b) Is the policy sufficiently clear as to how much new workspace would be expected in any development?**

Council's response

54. The explanatory text to Policy E6A contained within paragraph 7.40 states that the workspace element should be proportionate to the proposal's scale and location and have regard to the employment intensity of the most recent use. Consideration could be given to including this text in the policy wording to improve clarity.

**Q8.6 c) Are there any circumstances in which it would not be considered suitable or viable for new workspace to be delivered?**

Council's response

55. The intention of the policy is that proposals which are in accordance with the stated threshold and existing uses contained within paragraph 7.42 for redevelopment of vacant or underused sites and premises currently or recently used for business, industry or distribution should be for mixed use development and include provision for new workspace.

**Q8.6 d) Is the policy consistent with paragraph 123 of the NPPF, which states that local planning authorities should take a positive approach to applications for alternative uses on land which is currently developed but not allocated for development for a specific purpose in plans where this would help to meet identified needs?**

Council's response

56. The approach set out in the policy is intended to enable an efficient use of land and allow for the provision of alternative uses as well as an element of new workspace on land or premises currently or recently used for business, industry or distribution. This includes some land that was previously designated for industrial and warehousing use in the existing local plan.

57. This reflects an aim of the local plan to have a plan-led approach to promoting areas with the potential to increase densities and make efficient use of under-used land; this includes transforming some areas of the city to create communities with new homes and workplaces.

**Policy E6: Affordable workspace**

**Policy E6 seeks to secure the provision of affordable workspace. In response to PQ103, the Council have suggested main modifications to Policy E6 and associated reasoned justification. Appendix 4 of EXA024 sets out the Council's evidence of need for affordable workspace.**

**The response to PQ103 also sets out a number of suggested main modifications (these are also included in document EXA002.1).**

**Q8.7: Is Policy E6 justified, consistent with national policy and effective? In particular:**

**a) Is the principle of securing the provision of affordable workspace justified in principle and consistent with national policy, including those relating to planning obligations?**

Council's response

58. The justification for the principle of securing the provision of affordable workspace is set out in the response to PQ103 and contained within the associated information note in appendix 4 of EXA024.

59. The approach is considered to be consistent with national policy in that it is responding to patterns of market demand – in this particular instance for affordable workspace, both current and expected in the future – as Government Planning Practice Guidance (Housing and economic needs assessment) recommends. In addition, it supports high quality placemaking by providing space for a range of uses and activities that can bring vibrancy to local communities.

60. The approach is also considered to be consistent with national policy relating to planning obligations set out in the NPPF. There is an identified need for affordable workspace, there will be a loss of commercial floorspace as a result of redevelopment within the regeneration areas and provision of affordable workspace on the site is being sought to provide some mitigation.

***Q8.7 b) Is the policy sufficiently clear about the circumstances in which affordable workspace would be required? In this respect, would the proposed modifications suggested set out in EXA002.1 be justified and effective in their own right and necessary to make the Plan sound?***

Council's response

61. The proposed modifications suggested in EXA002.1 provide clarity regarding the circumstances in which affordable workspace would be required. Greater detail is provided in respect of the policy approach, by defining the scale and type of developments that affordable workspace will be sought from. These proposed modifications are considered necessary in order for the policy to work effectively and provide further detail about the operation of the policy. They are broadly reflective of the general scale of development that we expect to see come forward on sites in the areas of growth and regeneration.

***Q8.7 c) In relation to the suggested main modifications, on what basis have the types of development where affordable workspace would be required, and the associated thresholds, been identified?***

Council's response

62. The types of development and thresholds are broadly reflective of the general scale and nature of development that we expect to see come forward on sites in the areas of growth and regeneration.

***Q8.7 d) Is the policy, either as submitted or in terms of the Council's suggested modifications, sufficiently clear as to the scale of affordable workspace that should be delivered as part of any development and/or how this would be managed?***

Council's response

63. The level of affordable workspace that will be sought will be considered alongside scheme viability. Early engagement with affordable workspace operators indicates that c1,000sqm spaces provides sufficient economies of scale to manage, and this could be provided in one development or across several that are in proximity.

64. The policy requires the manager of such space, whether that is a workspace operator or the owner of the building, to submit a Workspace Management Plan that details how the space will be managed. The council intends to develop a template for the Workspace Management Plan that operators / owners can use.

***Q8.7 e) Would it be justified, or effective, to require an annual monitoring report to be submitted as set out in paragraph 7.51?***

Council's response

65. The council's Corporate Strategy (2022-2027) sets out a number of strategic themes and priorities, including Economy and Skills, which aims to promote 'economic growth that builds inclusive and resilient communities, decarbonises the

city and offers equity of opportunity'. Affordable, accessible workspace provides opportunities to create places of innovation and enterprise that will support the evolution of Bristol's economy, including its social enterprises and new priority sectors as they emerge and are identified.

66. An annual monitoring report would assist the council in monitoring of supply of affordable workspace, ensuring that affordable workspace is being used for its intended purpose, and would help capture data on social and economic value that is being delivered through the workspace, including sectoral demand, number of jobs and businesses supported, and wider value to the local community.

67. It is an approach which is already being undertaken by several authorities including Lambeth and the London Borough of Brent.

**Q8.7 f) Has the policy as submitted, or the proposed modifications, been subject to robust assessment of viability?**

Council's response

68. Viability testing will be expected to be done on a site-by-site basis for the delivery of affordable workspace within new development. While the delivery of affordable workspace through development may not be viable in every development context, given the scale of regeneration and growth across the city there will be areas where it is likely to be viable to deliver affordable workspace on-site.

**Policy E8: Digital connectivity and inclusion**

***The answer to PQ105 states that the intention of the policy is to add value to the legal requirements and statutory guidance through promoting competition among broadband providers and consumer choice.***

**Q8.8: Given the scope of the current Building Regulations, is it justified to 'add value' by exceeding the requirements of the Building Regulations?**

Council's response

69. The policy adds value to the Building Regulations' requirements by aiming to give choice in broadband / telecoms providers to residents / occupants.

70. This approach is considered justified as there have been developments within Bristol where developers have put in their own fibre provider meaning that residents/occupiers are subject to an effective monopoly and have no access to alternative ISPs.