

**Inspectors Louise Gibbons, Steven Lee,
and Benjamin Clarke**

c/o Robert Young (Programme Officer)

By Email: Robert.Young@Bristol.gov.uk

Matter: 14

Representor:
Structadene Group Ltd.

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6th March 2025

Dear Inspectors,

Bristol Local Plan Review – Inspectors Matters, Issues and Questions

Matter 14 – Climate Change and Flood Risk - Representation prepared by Strutt & Parker on behalf of Structadene Group Ltd.

Structadene Group Ltd. ('Structadene') maintains an interest in the redevelopment of two sites in the north-west quadrant of St Philip's Marsh ('SPM'), one abutting Camwal Road and one abutting Feeder Road.

Issue 14.1: Whether policies relating to climate change and energy efficiency are justified, effective and consistent with national policy.

Q14.1: Do any other elements of policies NZC1, NZC3, NCZ4 or NCZ5 fall within the scope of the WMS? If so, do any of the requirements exceed current or future building regulations? If so, are these elements justified and consistent with the requirements of the WMS?

1. The Written Ministerial Statement (WMS) sets out clarity on the development and application of local energy efficiency standards and states, *"the Government does not expect plan - makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations."*

2. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulations should be rejected at examination if they do not have a well - reasoned and evidenced rationale.
3. It is not overtly clear that such evidence has been produced.

Q14.2: Have the requirements of policies NZC1 to NZC5 been subject to robust assessment of viability?

1. Nothing to add beyond comments made elsewhere in our representations.

Q14.3: Is Policy NZC1 justified, consistent with national policy and effective? In particular:

a) Is the requirement for all development proposals to submit Sustainability Statements justified?

1. Nothing to add beyond comments made elsewhere in our representations.

b) Is the requirement for all residential or mixed-use developments of 200 dwellings or more to meet BREEAM Communities Excellent ratings justified and consistent with national policy?

2. Nothing to add beyond comments made elsewhere in our representations.

c) Is the reference to other sustainable design standards clear and unambiguous?

3. Whilst Structadene is supportive of the need to mitigate for and adapt to climate change, Structadene would welcome the recognition and incorporation of alternative standards, in addition to BREEAM.
4. Whilst the Policy refers to a number of sustainable design standards and methods that are also available and used within the industry, these are described as additional or voluntary, rather than as a suitable alternative for BREEAM. The Policy itself should recognise that alternatives can be used and set them out or state that accepted alternative methods will be set out in supplementary guidance.

d) *Is requiring the optional technical standards for water efficiency standards justified by a clear local need, as set out in the PPG?*

5. Nothing to add beyond comments made elsewhere in our representations.

Issue 14.2: Whether policies relating to flood risk and flood mitigation are justified, consistent with national policy and effective.

Q14.8: *Is policy FR1 justified, consistent with national policy and effective? In particular, is the approach to the sequential approach and exception test set out in the first paragraph consistent with paragraphs 161 – 164?*

1. Nothing to add beyond comments made elsewhere in our representations.

Q14.9: *Are the suggested main modifications to paragraph 12.2.6 set out in EXA002.1 necessary to make the Plan sound?*

1. Nothing to add beyond comments made elsewhere in our representations.

Q14.10: *Is policy FR2 justified, consistent with national policy and effective? In particular:*

a) *How is the Bristol Avon Flood Strategy expected to be considered in terms of Policy FR1 and the sequential test? For example, how would development in areas where mitigation is expected but not yet delivered be treated?*

1. Further clarity is needed as to the requirements and implementation of the Bristol Avon Flood Strategy and how development in areas where mitigation is expected but not yet delivered be treated.
2. Structadene supports the policy seeking a pragmatic approach to enabling development to come forward in advance of strategic flood defences. This seems sensible in theory, but in practice it will be necessary to understand what the strategic and comprehensive flood solution looks like for early developments to make appropriate allowances / safeguards.

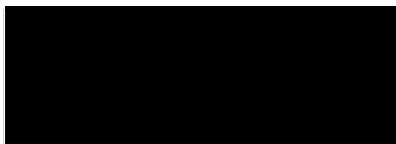
3. For example, if the strategic approach requires a wide area to be raised for a resilient access network or to accommodate a flood defence wall or creates a wall fronting the Feeder Canal – this needs to be planned for and delivered in a joined-up way.
4. The policy should also note that the Council is taking the lead in developing the comprehensive approach to flood mitigation.

b) Are the requirements relating to mitigation and/or the facilitation of future flood defences justified and consistent with national policy, including those relating to planning obligations?

5. As set out in the regulations and within Planning Practice Guidance, for an obligation to be sought it must be necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development.

WORD COUNT – 834

Yours sincerely,



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