



Bristol City Council

Historic England

Statement of Common Ground: July 2025

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# 1. Introduction

- 1.0.1 This statement of common ground has been prepared following the conclusion of the Bristol local Plan review examination hearings. It outlines where main modifications to the policies DC2: Tall buildings and CHE1: Conservation and the historic environment, as well as certain policies in the council's proposed development strategy, are required to be consistent with national planning policy in respect of Chapter 16 of the National Planning Policy Framework (NPPF September 2023). It is also intended to outline any areas of outstanding issues between Bristol City Council and Historic England.
- 1.0.2 As part of preparing this statement of common ground, further correspondence has taken place between Historic England and Bristol City Council (hereafter the council). A summary produced by Historic England of their responses to the council's modifications and any remaining outstanding issues can be found in Appendix 3. The council has provided comment on any outstanding issues in this table.
- 1.0.3 The statement has been prepared by the council and Historic England and was jointly agreed on 16 July 2025

## 2. Policy DC2: Tall buildings

2.0.1 In their Regulation 19 representation, Historic England identified a number of potential issues with policy DC2: Tall buildings. A dialogue between the council and Historic England has attempted to resolve any outstanding issues and modifications to the policy have been prepared both prior to and following the examination hearing that occurred on 11 March 2025 (Matter 13: Built environment).

### 2.1 Historic England Regulation 19 representation

2.1.1 Historic England, in their Regulation 19 representation relating to policy DC2: Tall buildings raised the following issues:

*We note that proposals for tall buildings will be expected to conform with the BCC supplementary planning document 'Urban Living: Making Successful Places at Higher Densities'. The SPD requires individual proposals for any building over 10 storeys to come forward as part of a spatial framework informed by characterisation, building height study, and context and urban design analysis to enable assessment against certain criteria.*

*We note that proposals for tall buildings will be expected to conform with the BCC supplementary planning document 'Urban Living: Making Successful Places at Higher Densities'. The SPD requires individual proposals for any building over 10 storeys to come forward as part of a spatial framework informed by characterisation, building height study, and context and urban design analysis to enable assessment against certain criteria.*

*Is it reasonable or appropriate for prospective developers of tall buildings to do this on an individual basis?*

*Can this incremental approach to the location of tall buildings be considered to be plan led and strategic?*

*How will the cumulative effects of successive individual proposals on the coherence of the cityscape be considered if there is no overall vision or strategy?*

*Consequently, might it be appropriate now, as part of the plan making process, to carry out such characterisation, building height study, context and urban design analysis (a city centre tall buildings study/strategy) to identify appropriate strategic locations/areas for tall buildings? Or is BCC confident such evidence currently exists, and the criteria led approach can be employed, mindful that "the city centre's unique townscape and topography contributes to its distinctiveness as a place" (BLP para 3.1.8).*

*Such work at the plan making stage, could help to provide clarity as to where tall buildings would, in principle, be considered appropriate; how high and what form they should take to inform housing capacity assumptions, and; ensure a coherent cityscape which responds positively to Bristol's character, important historic views and landmarks.*

*Currently the BLP Tall Building policy DC2 indicates that suitable areas may include the following:*

*Bristol City Centre, Bristol Temple Quarter, St. Philip's Marsh, and within or close to the city's town and district centres, see Policies DS1-DS14.*

*Does the absence of a tall building's study/strategy affect the Plan's soundness?*

***Suggested response/modification***

*To justify the potential locations for tall buildings set out in Policy UL1, BCC may wish to clarify whether further evidence [a tall buildings strategy] is required at this stage to provide a more explicit plan led approach to the location of potential future tall buildings.*

## **2.2 IN2 Inspectors' Preliminary Questions**

- 2.2.1 In their preliminary questions ([IN2: Preliminary Questions to Bristol City Council](#)), the inspectors issued a number of questions relating to policy DC2: Tall buildings:

*PQ152. Has the Council undertaken any form of tall buildings assessment or study to inform policy DC2?*

*PQ153. The 4th paragraph of policy DC2 refers to proposals being accompanied by sufficient information on which to assess their impact. What information would be required?*

*PQ154. Paragraph 3.1.26 provides a definition of tall buildings, could the Council please indicate why this definition is not included within the policy?*

*PQ155. Paragraph 3.1.29 refers to a requirement for Landscape and Visual Impact Assessments, is it intended that these should be submitted as part of any planning application?*

- 2.2.2 The council's responses to these questions can be found in document [EXA024 BCC response to Inspectors' Document IN2](#). Historic England's remarks can be found in their Hearing Statement re [Policy DS1, DS1A, DS2, Site Allocations](#).

## **2.3 IN4A Planning Inspectors' Matters, Issues and Questions**

- 2.3.1 Following the council's response to the preliminary questions, the inspectors sought further clarification on the following issues:

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

*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?*

*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? 52*

*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?*

*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?*

*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?*

*f) Is the policy consistent with other policies in the plan, including relevant DS policies and Policy CHE1?*

- 2.3.2 The council's response to the matters, issues and questions can be found in the [Matter 13: Built environment hearing statement](#). Historic England's remarks can be found in their [Hearing Statement re Policy DC2](#).

## **2.4 IN8: Action Points Matters 5-16 (Weeks 3-5)**

- 2.4.1 Following the conclusion of the examination hearings, the inspectors have issued a number of action notes relating to policy DC2: Tall buildings:

*The council should consider whether any of the guidance within the Urban Living SPD (EXA020) that includes policy requirements for Tall Buildings should be incorporated into Policy DC2 and propose draft main modifications accordingly.*

*In addition, draft main modifications for Policy DC2 for our consideration which:*

- 1. provide the policy references for the relevant DS areas in the first paragraph of the policy;*
- 2. include the definition of tall buildings (as set out in paragraph 13.1.26) into the policy wording and consequential amendments to the explanation; and*
- 3. the first sentence in paragraph 13.1.29 should be included within the policy text in an appropriate location and to ensure that the word 'Townscape' is added to the Visual Impact Assessments.*

- 2.4.2 The proposed modifications outlined in this statement of common ground, and in the council's schedule of modifications, have been prepared to address these issues.

## 2.5 Proposed modifications to policy DC2: Tall buildings

- 2.5.1 The council has prepared a number of modifications to policy DC2: Tall buildings in response to comments from the inspectors and from discussions with Historic England. Appendix 1 includes a modified version of the full policy wording for policy DC2: Tall buildings. These are outlined below:

New text underlined and deleted text ~~struckthrough~~.

- 2.5.2: **Modification 1:** Subsequent modification to policy wording. Additional wording to be added to policy wording paragraph beginning ‘Proposals for tall buildings should be accompanied by sufficient information...’

Proposals for tall buildings should be accompanied by sufficient information on which to assess their impact and will not be permitted where the required information has not been provided. Townscape/Landscape Visual Impact Assessments should be submitted for applications for tall buildings to enable the visual impact of tall buildings from near and distant viewpoints to be assessed. Information on any micro climate impacts should be provided either as a separate assessment or as part of the Design and Access Statement.

**Modification 1.1:** Landscape and visual impact assessment requirement. Subsequent modification to paragraph 13.1.29 (See modification 4.1 for micro climate issue).

~~Townscape/Landscape and Visual Impact Assessments should be submitted for applications for tall buildings will be necessary to enable the visual impact of tall buildings from near and distant viewpoints to be assessed. This~~ These should pay particular attention to impacts on skyline views and on the topography of the area. Accurate visual representations of the submitted scheme should be provided from key viewpoints agreed with the local planning authority. ~~Information on local micro-climate impacts should also be submitted, as a separate assessment or as part of the Design and Access Statement.~~

**Reason for modification:** to provide greater clarity to the requirement for landscape and visual impact assessments and to refer to ‘townscape’.

- 2.5.3 **Modification 2:** Definition of tall buildings. Insert new paragraph between first and second paragraph of policy text

For the purposes of this policy tall buildings are defined as those of 30 metres or more (equivalent to 10 storeys).

**Modification 2.1:** Subsequent modification to explanation text paragraph 13.1.26

~~13.1.26 For the purposes of this policy tall buildings are defined as those of 30 metres or more (equivalent to 10 storeys).~~

**Modification 2.3:** Subsequent modification to introductory text third paragraph.

Tall buildings also give rise to particular issues related to their height, massing and prominence as set out in this policy which applies to buildings of 30 metres or more (equivalent to 10 storeys). All the design principles for high density development set

out in other policies of the local plan are equally applicable to tall buildings, including liveability considerations for residential development.

**Reason for modification:** to provide greater clarity to what proposals the policy will apply to.

2.5.4 **Modification 3:** Urban Living SPD. Final paragraph of policy text.

Proposals will be expected to conform with relevant local design guides and codes. ~~Proposals for tall buildings should also have regard to and should also be consistent with the guidance for tall buildings set out in the council's supplementary planning document 'Urban Living: Making Successful Places at Higher Densities'.~~

**Modification 3.1:** Subsequent modification to explanation text. Paragraph 13.2.28.

In designing tall buildings, particular emphasis should be given to the appearance of the roof form, recognising the building's impact on the skyline and topography, and also the relationship of the base section of the building to the surrounding environment, to ensure there is enough activity and interest to counter the potentially dominating impact of the building's greater height. It may be appropriate to set taller elements of the building back from the street frontage. The Urban Living SPD provides detailed guidance and recommendations relating to the design of tall buildings in terms of their functional, environmental and visual quality and should be used to assist the preparation of proposals for tall buildings.

**Reason for modification:** To clarify the status of the Urban Living SPD and its guidance in relation to the design of buildings.

2.5.5 **Modification 4:** Reference to designated heritage assets and policy CHE1: Conservation and the historic environment. Policy text after list of bullets i-iv before paragraph beginning 'Residential tall buildings should be liveable...'

Tall buildings should not have a harmful impact by reason of:

- i) Creation of excessive shadowing and wind deflection or other harmful micro climate effects;
- ii) Unneighbourly impacts on the users of existing buildings due to unacceptable impacts on daylight, privacy and outlook (Policies DPM1 and DC1);
- iii) Unduly dominating impacts on adjoining buildings and the public realm; and
- iv) Inappropriate visual impacts over a wider area, including on the setting of heritage assets.

Proposals that are likely to have an impact on heritage assets will be expected to demonstrate that the requirements of policy CHE1: Conservation and the historic environment have been addressed.

Residential tall buildings should be liveable in accordance with Policies DPM1 'Delivering well-designed, inclusive places' and DC1 'Liveability in residential development including space standards'.

**Reason for modification:** to emphasise the need to ensure heritage assets are adequately considered in the preparation of tall building proposals.

- 2.5.6 **Modification 5:** Inclusion of reference to micro climate effects in policy wording. Policy text paragraph beginning ‘proposals for tall buildings should be accompanied by sufficient information on which to assess their impact...’

Proposals for tall buildings should be accompanied by sufficient information on which to assess their impact and will not be permitted where the required information has not been provided. Townscape/Landscape Visual Impact Assessments should be submitted for applications for tall buildings to enable the visual impact of tall buildings from near and distant viewpoints to be assessed. Information on any micro climate impact effects should be provided either as a separate assessment or as part of the Design and Access Statement.

**Modification 5.1:** Subsequent modification to explanation text paragraph 13.1.29.

~~Townscape/Landscape and Visual Impact Assessments will be necessary to enable the visual impact of tall buildings from near and distant viewpoints to be assessed. This should pay particular attention to impacts on skyline views and on the topography of the area. Accurate visual representations of the submitted scheme should be provided from key viewpoints agreed with the local planning authority. Information on local micro climate impacts should also be submitted, as a separate assessment or as part of the Design and Access Statement.~~

**Reason for modification:** For clarification on requirements for consideration of micro climate effects. Wording now included in policy text.

## 2.6 Outstanding issues

### Tall buildings strategy

- 2.6.1 Historic England, in their Regulation 19 representation relating to policy DC2: Tall buildings expressed concern over the absence of a tall building strategy. The council considers policy DC2: Tall buildings to adequately set out how the design and potential impacts of tall buildings should be addressed.
- 2.6.2 The policy makes reference to the potential harmful impacts that proposals should not cause, including inappropriate visual impacts over a wider area and the setting of heritage assets. The policy also requires Townscape/Landscape Visual Impact Assessments to be submitted, which would necessarily include review of issues relating to skyline, vistas, etc. The policy also works in conjunction with other policies in the local plan intended to secure positive design outcomes; in particular, policy DPM1: Delivering well-designed, inclusive places and policy CHE1: Conservation and the historic environment.
- 2.6.3 The policy’s identification of areas (which are detailed in policy UL1: Effective and efficient use of land) where tall buildings are acceptable *in principle* is based on their suitability in terms of access to necessary infrastructure and services, in particular, public transport. This approach to tall buildings is considered by the council to be sufficiently robust, with the potential impacts of a given proposal within these areas to be reviewed through the development management process. Consequently, the absence of a tall building study is not considered to be an issue of soundness.

## Tall buildings and development strategy areas

- 2.6.4 Historic England, in their Regulation 19 representation relating to policy DC2: Tall buildings noted the following:

*Currently the BLP Tall Building policy DC2 indicates that suitable areas may include the following:*

*Bristol City Centre, Bristol Temple Quarter, St. Philip's Marsh, and within or close to the city's town and district centres, see Policies DS1-DS14.*

*Does the absence of a tall building's study/strategy affect the Plan's soundness?*

- 2.6.5 Policy DC2: Tall buildings does not state that tall buildings are acceptable within all the development strategy areas (DS1-14) but rather refers to tall buildings being potentially appropriate in:

*'locations for the most intensive forms of development set out in policy UL1: 'Effective and efficient use of land' (Inner Urban Area, Bristol City Centre, Temple Quarter and St Philip's Marsh) or as identified in policies for specified regeneration areas, tall buildings may be appropriate where they would contribute positively to the character and function of the urban environment.'*

- 2.6.6 Policy UL1: Effective and efficient use of land sets out areas where 'more intensive' development may be appropriate. This does not necessarily mean tall buildings. Tall buildings are appropriate in principle (as noted in policy DC2: Tall buildings) within the inner urban area, Bristol City Centre, Temple Quarter and St Philip's Marsh or the following development strategy areas which specifically refer to tall buildings and policy DC2: Tall buildings:

- DS1: Bristol City Centre.
- DS1A: Bristol City Centre, Broadmead, Castle Park and the Old City.
- DS2: Bristol Temple Quarter.
- DS3: Saint Philip's Marsh (additional reference for clarity over tall buildings added via main modification).
- DS6: Lawrence Hill.
- DS7: Central Fishponds.
- DS8: Central Bedminster.

## 3. Policy CHE1: Conservation and the historic environment

3.0.1 In their Regulation 19 representation, Historic England identified a number of potential issues with policy CHE1: Conservation and the historic environment. A dialogue between the council and Historic England has attempted to resolve any outstanding issues and modifications to the policy have been prepared both prior to and following the examination hearing that occurred on 11 March 2025 (Matter 13: Built environment).

### 3.1 Historic England Regulation 19 Representation

3.1.1 Historic England, in their Regulation 19 representation relating to policy CHE1: Conservation and the historic environment (N.B Historic England refer to Section 13 Design and conservation in their representation and not policy CHE1: Conservation and the historic environment specifically) raised the following issues:

**Comment 1:**

*Historic England welcome a thorough and robust suite of heritage and design policy, and commitment to further design guidance, codes and discrete area plans to inform successful place shaping.*

*We do however note there is no reference to the role of Design Review nor the Council's Conservation Advisory Panel and it may be helpful to clarify their future role?*

**Comment 2:**

*NPPF para 196 states that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.*

*The BLP provides an opportunity to do so by identifying and providing a positive response to the current issues, risks, challenges and opportunities facing Bristol's historic environment.*

*At present there is no reference to the 12 entries on the national Heritage at Risk register (2023) in Bristol nor a response as part of a positive heritage strategy.*

*Examples of the heritage assets at risk in Bristol include the Stokes Croft Conservation Area; Brunel's swing bridge over the north entrance lock at the Cumberland Basin (within the earmarked Western Harbour regeneration area); and the Civil War earthworks on Brandon Hill.*

*We had also previously encouraged the Local Plan, as part of its positive strategy for the historic environment, to consider a response to the deteriorating condition of the Grade 1 Listed Ashton Court mansion and estate at the edge of the city; a property owned and managed by BCC but within the adjoining unitary authority (North Somerset).*

*Due to the above, Historic England considers the BLP is **UNSOUND** owing to its inconsistency with national policy (NPPF para 196). If BCC were to positively address*

*this matter and supplement the Plan, as we feel it can, then our attendance at an examination hearing would be unnecessary.*

**Suggested response/modification**

*To illustrate a positive strategy, a Heritage Topic Paper could be prepared (previously encouraged by Historic England). This could include how BCC/BLP considers and responds to the concerns and issues raised by the evidence base. It can also indicate how an assessment of the heritage impact of proposed allocations has taken place.*

*Section 13 of the BLP could paraphrase such a topic paper, setting out the key issues, risks (e.g. flood risk), challenges facing Bristol's heritage (e.g. high streets) and opportunities (the Old City), and an appropriate broad response as part of a positive strategy.*

*This might include for example, reference to the preparation of an updated version of 'Our Inherited City – Bristol Heritage Framework (BCC 2015)'.*

**Comment 3:**

*'Our Inherited City – Bristol Heritage Framework (2015-2018)' (BCC 2015) is a model document and there is a welcome reference at 13.2.14. However, to maintain its relevance and demonstration of BCC's commitment to a 'positive strategy for the historic environment' the BLP might/should also refer to a commitment to updating it?*

*'Our inherited City' contributes to a demonstration of a proactive and positive heritage strategy; an out of date version would conversely fail to do so, rendering the BLP UNSOUND due to its inconsistency with national policy (NPPF para 196).*

*If BCC can address this matter and modify the Plan, as we feel it can, then our attendance at an examination hearing would not be necessary.*

**Suggested response/modification**

*Provide a commitment to updating 'Our Inherited City – Bristol Heritage Framework'.*

## **3.2 IN2 Inspectors' Preliminary Questions**

- 3.2.1 In their preliminary questions ([IN2: Preliminary Questions to Bristol City Council](#)), the inspectors issued a number of questions relating to policy CHE1: Conservation and the historic environment

*PQ156. Why does Policy CHE1 not refer to the Buildings at Risk Register?*

*PQ157. Paragraphs 13.2.5 and 13.2.9 refer to Heritage Statements as either 'may be required' or 'should be submitted with planning applications'. Does the Council consider these different approaches to be consistent and if not, which is to be preferred? If it is the latter, should this be contained within the policy as it is a specific requirement that decisions makers would need to have regard to?*

*PQ158. Paragraph 13.2.8 refers to the Practice Guide to PPS5: Planning for the Historic Environment. Is this Guide extant?*

*PQ159. What is the status of the Our Inherited City Heritage Statement Guidance referred to in paragraph 13.2.14?*

*PQ160. Paragraph 13.2.15 relating to ‘energy efficiency and renewables’ refers to further guidance being provided in the council’s design guide. Is there a timetable to produce the design guide and will it be specific to the historic environment? Is there any relationship with paragraph 13.2.7, which also refers to design guides and codes?*

*PQ161. What is the status and age of the guidance SPD7, SPD2, PAN6 and PAN8 listed in bullets of paragraph 13.2.16?*

- 3.2.2 The council’s responses to these questions can be found in document [EXA024 BCC response to Inspectors’ Document IN2](#).

### **3.3 IN4A Planning Inspectors’ Matters, Issues and Questions**

- 3.3.1 Following the council’s response to the preliminary questions, the inspectors sought further clarification on the following issues ([IN4A Appendix 1: Bristol Local Plan – Draft Matters, Issues and Questions \(MIQs\)](#)):

*Paragraph 189 of the NPPF indicates that there are a range of heritage assets and refers to that these should be conserved in a manner appropriate to their significance. Paragraph 190 of the NPPF sets out that plans should set out a positive strategy for the conservation and enjoyment of the historic environment and sets out several factors to be taken into account in the strategy.*

*Q13.6: Is Policy CHE1 justified, effective and consistent with national policy? In particular:*

*a) Is the policy consistent with the NPPF and legal requirements relating to the historic environment where necessary, in respect of each part of the policy? Is the policy consistent with paragraph 202 of the NPPF in relation to the assessment of where less than substantial harm should be weighed against public benefits?*

*b) Is the policy clear and unambiguous about how the decision maker should react to development involving i) archaeology, ii) listed buildings; iii) conservation areas, iv) Registered historic parks and gardens and v) locally important heritage assets as well as vi) Buildings at Risk?*

*d) [sic] Are the Council’s proposed modifications set out in their response to PQ157 in respect of heritage statements necessary for soundness?*

*e) [sic] Is the Council’s proposed modification set out in their response to PQ159 in respect of PPS5 necessary for soundness?*

- 3.3.2 The council’s response to the matters, issues and questions can be found in the [Matter 13: Built environment hearing statement](#).

### **3.4 IN8 Action Points Matters 5-16 (Weeks 3-5)**

- 3.4.1 Following the conclusion of the examination hearings, the inspectors have issued a single action relating to policy CHE1: Conservation and the historic environment:

*Prepare and submit a Statement of Common Ground with Historic England which:*

*i) sets out where main modifications to the policies and explanation may be needed for Policy DC2 and Policy CHE1 to ensure that they are consistent with national policy*

*in respect of Chapter 16 of the NPPF (Conserving and Enhancing the Historic Environment);*

*ii) provide any draft wording for those main modifications. Any draft wording should be checked for consistency with the DS policies and consequential main modifications proposed to those if necessary;*

*iii) sets out any areas of remaining disagreement.*

### 3.5 Proposed modifications to policy CHE1: Conservation and the historic environment

3.5.1 The council has prepared a number of modifications to policy CHE1: Conservation and the historic environment in response to comments from the inspectors and from discussions with Historic England. Appendix 2 includes a modified version of the full policy wording for policy CHE1: Conservation and the historic environment. These are outlined below:

New text underlined and deleted text ~~struckthrough~~.

3.5.2 **Modification 1:** Overarching reference to the policy’s relationship to national planning policy. Policy text, first paragraph.

Bristol’s heritage assets will be conserved and enhanced in accordance with the provisions of national planning policy, ensuring that they continue to make a positive contribution to the character of all parts of the city.

**Reason for modification:** to provide an overarching link to the policy and the application of national planning policy regarding heritage, ensuring consistency.

3.5.3 **Modification 2:** Heritage statement requirement. Paragraph 13.2.5

This local plan includes an objective to cherish the city’s historic environment and harness the benefits of heritage sensitive regeneration. This policy sets out how the council proposed to secure the conservation and enhancement of heritage assets. It should be read in conjunction with the wider suite of design policies and the council’s design guides and codes. ~~The submission of other documents such as a Heritage Statements may be required to demonstrate compliance with this policy in accordance with heritage guidance.~~

**Modification 2.1:** Subsequent modification to explanation text. Paragraph 13.2.9.

A heritage statement should be submitted with planning applications which will or are likely to impact heritage assets to show how the proposal addresses this policy. The heritage statement should set out and address any impacts the proposed development may have on heritage assets.

**Reason for modification:** to provide greater clarity to the requirement for heritage statements.

3.5.4 **Modification 3:** Reference to public benefits. New subsection between ‘Locally important heritage assets’ and ‘understanding the asset’ in policy wording.

#### Public benefits

Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against public benefits in accordance with national planning policy.

In preparing this statement of common ground, further discussions have been undertaken between the council and Historic England (see appendix 3). A further modification has been proposed on this basis that builds on the above:

Harm, significance and public benefits

When considering a proposal affecting a designated heritage asset, great weight will be given to its conservation and enhancement. Any level of harm will require clear and convincing justification, considering the significance of the asset and any level of public benefits the proposal may generate in accordance with national planning policy and guidance.

Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against public benefits in accordance with national planning policy.

**Reason for modification:** To better reflect the NPPF (September 2023) and the government's Historic Environment guidance in the Planning Practice Guidance.

3.5.5 **Modification 4:** Erroneous reference to outdated guidance. Paragraph 13.2.8.

The concept of the significance of an asset is an important consideration in assessing and determining applications that may affect a heritage asset. The definition of significance is given in the National Planning Policy Framework and the various means by which the significance of an asset can be measured are set out in the National Planning Practice Guidance (Historic Environment). ~~Practice Guide to PPS5: Planning for the Historic Environment.~~

**Reason for modification:** To correct an erroneous reference to outdated guidance.

3.5.6 **Modification 5:** Heritage at Risk Register. New subsection in explanation text between 13.2.8 and 13.2.9.

In assessing applications involving heritage assets on the Heritage at Risk Register, positive regard will be had to the potential for proposals to reduce risk to any affected assets.

**Reason for modification:** To reflect the importance of the Heritage at Risk Register and the public benefit of removing risk to heritage assets.

3.5.7 **Modification 6:** Our Inherited City. Paragraph 13.2.14.

In addition to these resources, the council has produced Our Inherited City, a strategy for managing Bristol's heritage. This strategy sets out priorities for the city's historic environment with a focus on city and neighbourhood identities, consistent with the National Design Guide and National Model Design Code. The council intends to update this strategy in 2025. Applicants should refer to the Our Inherited City Heritage Statement Guidance ~~(2020)~~. This guidance has been prepared to assist developers, planners and other stakeholders engaged in projects that have the potential to impact the historic environment. Details of listed buildings, both nationally and locally, can be found on the council's website. This guidance has been prepared to assist developers, planners and other stakeholders engaged in projects that have the potential to impact the historic environment. Details of listed buildings, both nationally and locally, can be found on the council's website.

**Reason for modification:** To better reflect the role of Bristol’s heritage strategy, Our Inherited City and the council’s intention to update it.

- 3.5.8 **Modification 7:** Significance of heritage assets. New wording following list i-iv in policy wording under subsection ‘Conserving heritage assets’.

Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to:

- i. Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and
- ii. Demonstrate that the works proposed are the minimum required to secure the long term use of the asset; and
- iii. Demonstrate how those features of a heritage asset that contribute to its historical, archaeological, social, artistic or architectural interest will be retained; and
- iv. Demonstrate how the local character of the area will be respected.

The effect of an application on the significance of a non-designated heritage asset will be assessed having regard to the scale and harm of loss and the significance of the heritage asset.

**Reason for modification:** To clarify how proposals affecting non-designated heritage assets will be assessed and reflect paragraph NPPF paragraph 203 (September 2023). This issue was raised during the examination hearings.

## 3.6 Outstanding issues

### Specific references to assets on the Heritage at Risk Register

- 3.6.1 The council has proposed a modification to policy CHE1: Conservation and the historic environment in order to refer to the Heritage at Risk Register to address this issue. This is considered appropriate as it sufficiently addresses the issue without the need to list all assets on the list within the authority’s boundaries.

### Reference to Ashton Court mansion and estate

- 3.6.2 The council acknowledges the need to conserve and enhance the Ashton Court mansion and estate. The estate and mansion, including its buildings are almost wholly located within North Somerset Council’s boundaries and so any development management issues relating to the site would be addressed by North Somerset council and not governed by the provisions of the Bristol local plan.
- 3.6.3 As previously noted, the council is updating its heritage strategy ‘Our Inherited City’. The strategy will reiterate the council’s ongoing commitment to the conservation of the Ashton Court mansion and estate and to work constructively with key stakeholders and North Somerset Council.

### **Heritage Topic Paper**

- 3.6.4 The council has not prepared a heritage topic paper and does not consider this appropriate at this stage of the local plan review process. Historic England note in their Regulation 19 representation that a topic paper could be used to respond to concerns raised by them, as well as provide indication of how an assessment of the heritage impact of proposed allocations has been conducted. This statement of common ground is intended to outline how the council has responded to Historic England's concerns and information relating to the site allocation assessment process has been provided in the council's [TPC001 Allocations and Designations Process Topic Paper](#) as noted in [response](#) to PQ13 and 14, and MIQ Q17.5 ([Matter17](#)).

### **Our Inherited City**

- 3.6.5 Historic England have in discussions with the council as part of the preparation of this statement noted that they do not consider the modifications made to highlight the role of Our Inherited City to be sufficient. The council considers the proposed modifications to be sufficient to outline the role of the strategy and the council's future design guidance.

## 4. Other issues - modifications

- 4.0.1 In addition to the issues relating to policies DC2: Tall buildings and CHE1: Conservation and the historic environment, Historic England have also noted raised concerns with other policies in the local plan to which the council has responded.

### 4.1 Policy DS1: Bristol City Centre

- 4.1.1 Historic England, in their hearing statements relating to policy DS1: Bristol City Centre raised the following issues:

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

**Historic England response.**

*Historic England acknowledge the following positive references in Policy DS1:*

*The design of development will be expected to demonstrate high quality place making in terms of appearance, function, conservation of heritage assets...*

- 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. ...*

*However, does **'have regard to'** (see underlined text above) accord with the same **great weight** that should be given to the conservation of designated heritage assets (NPPF para 199 and as expressed at para 13.2.3 Policy CHE1, and CHE1 policy text "Bristol's heritage assets **will** be conserved and enhanced, ensuring that they continue to make a positive contribution to the character of all parts of the city.) Perhaps a modification could be made to ensure the appropriate weight is afforded heritage assets in Policy DS1 and ensure the Plans soundness in this respect.*

- 4.1.2 In response to this, as well as conversations with Historic England as part of preparing this statement, the council has proposed a modification to policy DS1: Bristol City Centre to enhance the reference to heritage assets.

New text underlined and deleted text ~~struck through~~.

- 4.1.3 **Modification 1:** Heritage assets. Policy DS1, policy text, under subheading 'Place principles', new wording under first bullet point beginning 'proposals will have regard to the area's important heritage...'.

Great weight will be given to the conservation and enhancement of the area's important heritage assets and proposals should respond appropriately to key views and landmarks set out in the relevant Conservation Area Character Appraisals and other supporting policy and guidance. Development affecting heritage assets will be assessed in accordance with Policy CHE1 'Conservation and the historic environment'.

## 4.2 Policy DS2: Bristol Temple Quarter

- 4.2.1 Historic England, in their Regulation 19 representation relating to policy DS2: Bristol Temple Quarter raised the following issues:

*The iconic Temple Meads station is nationally significant and has been a primary consideration in past and recent planning of the area. It is therefore a surprise, and concern, that a continued explicit commitment in the BLP to ensuring its setting is safeguarded is not provided. This may be unintentional but could have inadvertent consequences. It appears that the Sustainability Appraisal appears to concur. The BLP provides the means to confirm the key principles to shape the form, height and location of future surrounding development. The Policy makes specific reference to the Silverthorne Lane Conservation Area but not the Grade 1 Listed Temple Meads Station.*

*Without doing so Historic England consider that the BLP fails to provide great weight to the conservation of this preeminent heritage asset in accordance with the expectation of national policy, NPPF section 16, and as consequence the Plan is considered to be UNSOUND. If, however BCC can address this matter and modify the Plan, as we feel it can, then our attendance at an examination hearing would not be necessary.*

***Suggested response/modification***

*Clarify, explicitly, the need for future development to safeguard the setting of Temple Meads station.*

*Such as: Future proposals must consider the careful location and height of buildings to safeguard the setting of Temple Meads, including the key views of the principal station building, the Brunel terminus and main train shed, particularly from the station approach ramp, and Bath Road.*

- 4.2.2 In response to this and conversations with Historic England preparing this statement of common ground, the council has proposed a modification to policy DS2: Bristol Temple Quarter to make specific reference to the Bristol Temple Meads station.

New text underlined and deleted text ~~struckthrough~~.

- 4.2.3 **Modification 1:** Bristol Temple Meads. Policy DS2, policy text, under subheading 'Place principles', new wording after the third paragraph.

Development affecting heritage assets will be assessed in accordance with Policy CHE1 'Conservation and the historic environment'. This will include giving great weight to the historic significance of the Grade I listed Bristol Temple Meads Station and safeguarding its setting with particular regard to the key views to and from the station buildings.

This wording has been modified further following discussions with Historic England as part of preparing this statement of common ground.

**Reason for modification:** To specifically address the setting of Bristol Temple Meads Station.

### 4.3 Policy DS4: Western Harbour

- 4.3.1 Historic England, in their Regulation 19 representation relating to policy CHE1: Conservation and the Historic Environment raised the following issue:

*NPPF para 196 states that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.*

*The BLP provides an opportunity to do so by identifying and providing a positive response to the current issues, risks, challenges and opportunities facing Bristol's historic environment.*

*At present there is no reference to the 12 entries on the national Heritage at Risk register (2023) in Bristol nor a response as part of a positive heritage strategy.*

*Examples of the heritage assets at risk in Bristol include the Stokes Croft Conservation Area; Brunel's swing bridge over the north entrance lock at the Cumberland Basin (within the earmarked Western Harbour regeneration area); and the Civil War earthworks on Brandon Hill.*

- 4.3.2 In response to this, the council has proposed a modification to policy DS4: Western Harbour to make specific reference to the Brunel Swing Bridge:

New text underlined and deleted text ~~struckthrough~~.

- 4.3.3 **Modification 1:** Brunel Swing Bridge. Policy DS4, policy text, under subheading 'Place principles', new wording added as final bullet point.

Development will be expected to provide appropriately for the following:

- The provision of flood defences and flood mitigation measures in accordance with the Bristol Avon Flood Strategy. Any defences should be appropriately incorporated into the development and provide for enhanced public realm, green infrastructure provision and enhancements to the historic environment;
- A network of accessible pedestrian walkways along the Cumberland Basin, Floating Harbour and River Avon New Cut, including new and improved/restored crossing points, consistent with Policy BG5 'Biodiversity and access to Bristol's waterways';
- Strengthened pedestrian and cycle links, including wayfinding, between Hotwells, Spike Island, Southville, Ashton Gate and the strategic cycle network
- Have regard to the conservation and enhancement of the Grade II\* listed Brunel's Swing Bridge.

**Modification 1.1:** Cross reference to CHE1: Conservation and the Historic Environment. Policy text under 'place principles'.

Proposals will have regard to the area's important heritage assets and respond appropriately to key views and landmarks set out in set out in the relevant

Conservation Area Character Appraisals and other supporting policy and guidance in accordance with policy CHE1.

**Reason for modification:** to reflect the importance of the Grade II\* listed Brunel's Swing Bridge which is on the Heritage at Risk Register and provide a reference to CHE1: Conservation and the historic environment.

#### **4.4 Site allocation SA202 Land to the west of Lodge Street**

- 4.4.1 Historic England, in their Regulation 19 representation relating to policy DA1: Proposed development allocations raised the following issues:

*Site allocation SA202. Land to the west of Lodge Street. It may be useful to refer to the potential, and implications, of significant below ground archaeology.*

- 4.4.2 The council has following the hearings concluded that allocation SA202 should be removed from the local plan.

## 5. Other outstanding issues

### 5.1 Section 16 Development allocations

- 5.1.1 Historic England, in their regulation 19 representation relating to Section 16 Development Allocations raised the following issues:

*Site allocations and a consideration of the historic environment*

*It is unclear how a conservation of the significance of affected heritage assets has been given due weight in a consideration of the principle, form and capacity of the proposed allocations. The Urban Potential Assessment Report (November 2023) does not appear to do so.*

*It is important to appreciate the method by which any heritage assessment was undertaken to demonstrate how the NPPF and legislative tests (e.g. S66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) for the historic environment have been appropriately applied.*

*NPPF, paragraph 31 expects that “policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned...”.*

*NPPF paragraph 201, highlights that local planning authorities should identify and assess the significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.*

*NPPF paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

*A core planning principle of the NPPF is that to achieve sustainable development heritage assets should be conserved in a manner appropriate to their significance as part of the Plan’s positive conservation strategy for the historic environment.*

*Since the outset of the plan’s preparation we have encouraged considering the application of Historic England’s advice note no.3 The Historic Environment and Site Allocations in Local Plan, which provides advice to help undertake robust assessments to inform suitable and deliverable allocations.*

*Without such evidence to show how BCC has applied national policy to determine site suitability, the Plan is considered not to be justified or to have been prepared in accordance with national policy. As such the plan is considered to be UNSOUND. However, if BCC can address this matter, as we feel it might, then our attendance at an examination hearing to discuss the matter would be unnecessary.*

***Suggested response/modification***

*A Heritage topic paper could provide the means to set out the process of assessment employed to demonstrate an appropriate consideration of the historic environment has taken place (great weight). We strongly recommend consideration of Historic England advice*

*GPA - Note 3 The Setting of Heritage Assets, and Site Allocations in Local Plans HEAN3*

*It will be important for the Plan to demonstrate that it has included sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development, such as to positively respond to the historic environment the response to minimise harm and secure optimise enhancement (NPG Paragraph: 002 Reference ID: 61-002-20190315)*

*Site allocation SA202. Land to the west of Lodge Street. It may be useful to refer to the potential, and implications, of significant below ground archaeology.*

*Site BDA1301. It would be helpful to appreciate how BCC has considered the contribution the cricket ground makes to the character and appearance of the Stapleton and Frome Valley Conservation Area. Would redevelopment satisfy S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and a desirability of preserving or enhancing its character or appearance.*

- 5.1.2 The council's response to the outstanding issue of a heritage topic paper in section 3.6.3 of this statement of common ground sets out the council's view on this matter.
- 5.1.3 The council has responded to the suggested response/modification made by Historic England for site allocation SA202 in section 4.2 of this document.
- 5.1.4 The council does not consider the modification proposed to site allocation BDA1301 to be necessary, as the site allocation refers explicitly to the Stapleton and From Valley Conservation Area and any listed buildings proximate to the site.
- 5.1.5 Historic England have indicated in their correspondence as part of the preparation of this statement that this remains an outstanding issue in their view.

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

- 5.2.1 Historic England, in discussions with the council as part of the preparation of this statement of common ground have noted that a reference to a proposed tall building strategy may be appropriate in this policy. The council has outlined its position on a tall building strategy in section 2.6 of this statement.

## **5.3 Policy E4: Avonmouth Industrial Area and Bristol Port/E5: Industrial and distribution areas**

- 5.3.1 Historic England, in their Regulation 19 representation relating to policies E4: Avonmouth Industrial Area and Bristol Port and E5: Industrial and distribution areas raised the following issues:

*We concur with the Sustainability Appraisal. 'Policy E5 is considered to have greater potential to result in adverse effects relating to the historic and natural environment.*

*The Avonmouth Industrial Area and Bristol Port contains or is in close proximity to a number of heritage assets including “Mere Bank and Flanking Ditches” Scheduled Monument, “Heavy Antiaircraft battery 520m east of Holes Mouth” Scheduled Monument and the Grade II listed “Bristol Tramways Company Avonmouth Depot”.*

*There is also the potential for the location to contain areas of unknown archaeology which may be of significance.*

*We note that a small proportion of Land at Kings Weston Lane overlaps the Scheduled Monument (‘The Mere Bank and Flanking Ditches’), and therefore, there is potential for development to have negative effects upon this designated heritage asset of the highest significance. It would be helpful for the Plan to address this important matter to ensure the Plans consistency with national policy, a key issue of soundness.*

***Suggested response/modification***

*The Plan can indicate how development should respond to the likely heritage impacts, mindful of the need for the Plan to demonstrate that it has included sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development, such as to positively respond to the historic environment the response to minimise harm and secure optimise enhancement (NPG Paragraph: 002 Reference ID: 61-002-20190315).*

- 5.3.2 The council considers the approach in policy E4: Avonmouth Industrial Area and Bristol Port and E5: Industrial and distribution areas to be sound in regard to the potential for development either in the areas covered by the policies to impact on heritage assets.
- 5.3.3 Any development with the potential to impact on designated or non-designated heritage assets, including those identified in both the Sustainability Appraisal and Historic England’s representation would be assessed against the requirements of the plan as a whole, in particular policy CHE1: Conservation and the historic environment, ensuring that adequate consideration is given to said assets’ historic significance.

## **5.4 Policy IDC1: Development contributions and CIL**

- 5.4.1 Historic England, in their Regulation 19 representation relating to policy IDC1: Development contributions and CIL raised the following issues:

*Bristol’s heritage assets, it’s historic spaces, parks and gardens are all relevant and essential infrastructure to support a growing urban population. They often provide the social places for congregation, leisure and recreation. Improvements to enable increased use can be supported by development contributions and CIL. There is a risk that if the Plan does not refer to such matters, the opportunity may be lost, and fail to provide a deliverable positive strategy for the conservation of the historic environment (NPPF para 196).*

*For example, BCC proposes welcome improvements to Castle Park, funded by development contributions/CIL. Would that be more difficult to do so without appropriate reference in the Plan?*

***Suggested response/modification***

*Consider including reference to improvements to the city's heritage assets, places and spaces as an appropriate recipient of CIL and development contributions.*

- 5.4.2 The allocation of CIL funding or specific mitigation measures associated with Section 106 contributions are not issues to be addressed through the local plan. The policy does not provide a list of specific issues on which CIL or S106 funding can be spent. CIL funding is used to deliver infrastructure that supports the city's growth, including improvements to historic assets and spaces where appropriate. Section 106 contributions are associated with mitigating specific impacts of a given development proposal, and as such may include measures to protect historic assets and spaces in the city.

## 6. Final remarks

- 6.0.1 Throughout the preparation of this statement, Historic England and the council have continued to discuss remaining outstanding issues. On 10 July 2025, the council received Historic England’s closing remarks below via email, to which, the council has prepared the response detailed in this section.
- 6.0.2 Historic England have identified two outstanding issues with policy DC2: ‘all buildings’ in their closing remarks:

### **Re Policy DC2 Tall Buildings**

*Unfortunately, the proposed modifications fail to address Historic England’s concern and suggested remedy, that Inspector Louise Gibbons asked that BCC consider at the Hearing in March. We had suggested that whilst we have consistently said that there is value in producing evidence at the plan making stage, we also acknowledged in our Written Statement that as the LA intends to prepare an updated Heritage Strategy (Our Inherited City) and produce a Design Guide; might this perhaps be the means to provide the missing evidence and in turn help to ensure policy DC2 is effective in sustaining the city’s heritage assets, the character and appearance of its conservation areas and the coherence of Bristol’s sensitive townscapes?*

*Historic England had been informed by BCC that ‘Our Inherited City’ (its heritage strategy) and the proposed Design Guide would, in addition to the Urban Living SPD, provide important guidance in relation the Bristol’s (cherished) historic environment to inform the location and form of future tall buildings.*

*Historic England have indicated in our written statements, and when making oral representations of the BLP Examination Hearing, how these concerns might be resolved by reference in the Policy and/or written justification to:*

*a) the need for a heritage assessment (as this is different from an LVIA and/or Townscape assessment);*

*b) specific ref in the Policy and/or justification, to the relevance of Our Inherited City, and proposed Design Guide.*

### **6.1 Heritage statements**

- 6.1.1 Suggested modifications to the policy now include specific reference to the need for proposals which will or are likely to impact heritage asset to respond to policy CHE1: ‘Conservation and the historic environment.’ This policy sets out the approach to dealing with heritage conservation and enhancement across all development types, including tall buildings. A specific reference to heritage statements in the policy is not considered necessary, as policy CHE1: ‘Conservation and the historic environment’ sets out in its explanation text at paragraph 13.2.9 that a Heritage Statement should be submitted for applications which may or will affect heritage

assets. Information regarding when a heritage statement is required can also be found in the council's [Local List of Planning Application Requirements](#). Whilst the policy does set out that proposals for tall buildings should be accompanied by a townscape/landscape visual impact assessment, this differs from the need for a heritage statement, as it applies to all proposals, regardless of their impact on heritage assets.

- 6.2.2 The council suggests a modification to the explanation text of policy DC2: 'Tall buildings' to provide a reference to heritage statements in line with Historic England's remarks.

New text underlined and deleted text ~~struck through~~.

- 6.2.3 **Modification 1:** Heritage statements, policy DC2: 'Tall buildings' explanation text, new paragraph between 13.1.28 and 13.1.29.

<p><u>In order to address the heritage aspects of this policy, and policy CHE1: 'Conservation and the historic environment', a Heritage Statement should be submitted with planning applications for tall buildings which will or are likely to impact heritage assets.</u></p>
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**Reason for modification:** to clarify where a proposal for a tall building should submit a heritage strategy as referenced in paragraph 13.2.9 of the explanation text of policy CHE1: 'Conservation and the historic environment.'

## 6.2 Our Inherited City and the Bristol Design Guide

### Our Inherited City

- 6.2.1 The council notes Historic England's concerns regarding the reference to Our inherited City in policy CHE1: 'Conservation and the historic environment' and in policy DC2: 'Tall buildings.' The council has suggested a modification to highlight Our Inherited City in response to Historic England in Hearing Statement 13 (paragraph 3.5 of this statement).
- 6.2.2 The council does not consider it would be appropriate to refer in the local plan policy or explanation to specific aspects of Our Inherited City and its potential role in determining locations or suitable design of tall buildings prior to its preparation and adoption because it would be referring to a document that has not yet been fully prepared and which does not have a formal planning status. Our Inherited City, the council's heritage strategy will serve primarily to outline detailed information and considerations relating to the historic environment for development proposals to consider, functioning as a resource used to support applicants. The council considers the reference to it in the explanatory text to policy CHE1: 'Conservation and the historic environment' reflects its role and function.

### Bristol Design Guide

- 6.2.3 The role of the future Bristol Design Guide is referred to in the explanation to Policy CHE1 as well as other policies in the design and conservation chapter including DC2: Tall Buildings. The Bristol Design Guide will set out guidance across a wide range of design topics, including tall buildings and will be adopted as an SPD. The references

to design guidance in the Design and Conservation Chapter explain its intended function and relationship with the chapter's policies, including DC2 and CHE1. Upon adoption, the SPD would become a material consideration for development proposals and as such would be taken into account when assessing proposals for tall buildings.

## 7. Agreement

7.0.1 This statement of common ground has outlined where agreement has been made on various issues throughout the local plan between Historic England and Bristol City Council, as well as any remaining outstanding issues. Both parties have agreed to the final version of this statement as indicated below:

**Historic England**

*Rohan Torkildsen MRTPI UDPG*

Signed on behalf of Historic England

**Bristol City Council**

*Colin Chapman*

C Chapman Deputy Head of Planning Services (Planning Policy)

Signed on behalf of Bristol City Council

Dated

16 July 2025

## Appendix 1: Modified Policy DC2: Tall buildings

Tall buildings can contribute to helping Bristol accommodate new development as well as communicating ambition, energy and innovation. They can contribute to making efficient use of land to deliver jobs, homes and mixed communities. Tall buildings in the right locations and of the right design have the potential to enhance the appearance and character of areas and to contribute to regeneration.

Tall buildings may be proposed for a variety of uses, including workspace (particularly in Bristol City Centre) and new homes. In all cases the design of a tall building should create a high quality environment both for its users and also for surrounding development and the public realm.

Tall buildings also give rise to particular issues related to their height, massing and prominence as set out in this policy which applies to buildings of 30 metres or more (equivalent to 10 storeys). All the design principles for high density development set out in other policies of the local plan are equally applicable to tall buildings, including liveability considerations for residential development.

### **Policy text**

**In the locations for the most intensive forms of development set out in Policy UL1 ‘Effective and efficient use of land’ (Inner Urban Area, Bristol City Centre, Temple Quarter and St Philip’s Marsh) or as identified in policies for specified regeneration areas, tall buildings may be appropriate where they would contribute positively to the character and function of the urban environment.**

**For the purposes of this policy tall buildings are defined as those of 30 metres or more (equivalent to 10 storeys).**

**Tall buildings should be designed and located to be visually attractive, creating a positive feature in the urban environment from nearby viewpoints through to distant views, taking into account their individual and cumulative contribution with other existing and proposed tall buildings.**

**Proposals for tall buildings will be expected to demonstrate high quality design throughout their height to reflect their wider impact on the urban environment and skyline.**

**Tall buildings should not have a harmful impact by reason of:**

- i. Creation of excessive shadowing and wind deflection or other harmful micro climate effects;**
- ii. Unneighbourly impacts on the users of existing buildings due to unacceptable impacts on daylight, privacy and outlook (Policies DPM1 and DC1);**
- iii. Unduly dominating impacts on adjoining buildings and the public realm; and**
- iv. Inappropriate visual impacts over a wider area, including on the setting of heritage assets.**

**Proposals that are likely to have an impact on heritage assets will be expected to demonstrate that the requirements of policy CHE1: 'Conservation and the historic environment' have been addressed.**

Residential tall buildings should be liveable in accordance with Policies DPM1 'Delivering well-designed, inclusive places' and DC1 'Liveability in residential development including space standards'.

Proposals for tall buildings should be accompanied by sufficient information on which to assess their impact and will not be permitted where the required information has not been provided. **Townscape/Landscape Visual Impact Assessments should be submitted for applications for tall buildings to enable the visual impact of tall buildings from near and distant viewpoints to be assessed. Information on any micro-climate impacts should be provided either as a separate assessment or as part of the Design and Access Statement.**

Proposals will be expected to conform with relevant local design guides and codes. **Proposals for tall buildings should also have regard to ~~and should also be consistent with~~ the guidance for tall buildings set out in the council's supplementary planning document 'Urban Living: Making Successful Places at Higher Densities'.**

#### **Explanation**

~~For the purposes of this policy tall buildings are defined as those of 30 metres or more (equivalent to 10 storeys).~~

This policy does not aim to conceal tall buildings from view, but to ensure that they are located and designed to create a positive feature in the urban environment from nearby viewpoints through to distant views.

In designing tall buildings, particular emphasis should be given to the appearance of the roof form, recognising the building's impact on the skyline and topography, and also the relationship of the base section of the building to the surrounding environment, to ensure there is enough activity and interest to counter the potentially dominating impact of the building's greater height. It may be appropriate to set taller elements of the building back from the street frontage. **The Urban Living SPD provides detailed guidance and recommendations relating to the design of tall buildings in terms of their functional, environmental and visual quality and to assist the preparation of proposals for tall buildings.**

**In order to address the heritage aspects of this policy, and policy CHE1: 'Conservation and the historic environment', a Heritage Statement should be submitted with planning applications for tall buildings which will or are likely to impact heritage assets.**

**Townscape/Landscape and Visual Impact Assessments should be submitted for applications for tall buildings. ~~will be necessary to enable the visual impact of tall buildings from near and distant viewpoints to be assessed. This~~ These** should pay particular attention to impacts on skyline views and on the topography of the area. Accurate visual representations of the submitted scheme should be provided from key viewpoints agreed with the local planning authority. ~~Information on local micro-~~

~~climate impacts should also be submitted, as a separate assessment or as part of the Design and Access Statement.~~

†

## Appendix 2: Modified Policy CHE1: Conservation and the historic environment

This policy aims to ensure that this legacy is stewarded with sensitivity, creativity and innovation to ensure that the benefits it brings continue to be realised into the future. Great weight is given to the conservation of designated heritage assets.

The sympathetic management of heritage assets requires an understanding of the assets themselves and the context in which they exist. Early discussions on development proposals, before the submission of a planning or listed building application, may also assist in avoiding costly work at a later stage.

This local plan includes an objective to cherish the city's historic environment and harness the benefits of heritage sensitive regeneration. This policy sets out how the council proposes to secure the conservation and enhancement of heritage assets. It should be read in conjunction with the wider suite of design policies and the council's design guides and codes. ~~The submission of other documents such as a Heritage Statements may be required to demonstrate compliance with this policy in accordance with heritage guidance.~~

### **Policy text**

Bristol's heritage assets will be conserved and enhanced **in accordance with the provisions of national planning policy**, ensuring that they continue to make a positive contribution to the character of all parts of the city.

### ***General principles***

Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance. Development that has an impact upon a heritage asset will be expected to conserve and, where appropriate, enhance the existing asset or its setting.

### **Archaeology:**

Scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in situ. Where clear and convincing justification is provided for the loss of archaeological significance, provision should be made for the preservation by record of the affected assets. The appropriate publication and archiving of the results from any fieldwork will be expected in accordance with heritage guidance.

### **Listed Buildings:**

Alterations, extensions or changes of use to listed buildings, or development in their vicinity, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.

### **Conservation Areas:**

Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.

### Registered Historic Parks and Gardens:

Development will be expected to have no adverse impact on the design, character, appearance or settings of registered historic parks and gardens and to safeguard those features which form an integral part of their character and appearance.

### Locally important heritage assets:

Proposals affecting locally important heritage assets should ensure they are conserved having regard to their significance and the degree of any harm or loss of significance.

#### *Understanding the asset*

Development proposals that would affect heritage assets will be expected to demonstrate, by a thorough understanding of the significance of the asset, how any change proposed would conserve and, where appropriate, enhance that significance.

#### *Conserving heritage assets*

Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to:

- i. Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and
- ii. Demonstrate that the works proposed are the minimum required to secure the long term use of the asset; and
- iii. Demonstrate how those features of a heritage asset that contribute to its historical, archaeological, social, artistic or architectural interest will be retained; and
- iv. Demonstrate how the local character of the area will be respected.

**The effect of an application on the significance of a non-designated heritage asset will be assessed having regard to the scale and harm of loss and the significance of the heritage asset.**

#### **Harm, significance and public benefits**

**When considering a proposal affecting a designated heritage asset, great weight will be given to its conservation and enhancement. Any level of harm will require clear and convincing justification, considering the significance of the asset and any level of public benefits the proposal may generate in accordance with national planning policy and guidance.**

**Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against public benefits in accordance with national planning policy.**

#### Recording the asset

**Where a proposal would result in the partial or total loss of a heritage asset or its setting, the applicant will be required to:**

- i. Instigate a programme of recording of that asset; and**
- ii. Ensure the publication and archiving of that record in an appropriate form.**

#### **Energy efficiency retrofit, sustainable heating and renewable energy systems**

**The installation of energy efficiency measures, sustainable heating and renewable energy generation systems in listed buildings or those within conservation areas will be supported provided that the proposals would not adversely affect the character and appearance of the heritage asset.**

#### **Explanation**

##### *Heritage assets*

13.2.6 Heritage assets are defined as buildings, monuments, sites, places, areas and landscapes positively identified as having a degree of historic significance meriting consideration in planning decisions.

13.2.7 Heritage assets of national importance will generally be protected as designated assets under the Listed Buildings and Conservation Areas Act (1990) or the Ancient Monuments and Archaeological Areas Act (1979). However, the historic environment comprises a wide range of assets, which may not merit formal designation, but are nevertheless highly regarded and often much-loved elements of an area. They may be identified during the planning process or during the process of assessments of local character, such as Conservation Area Character Appraisals. Equally, they may be identified by local communities and individuals as part of the preparation of a Local List. Locally listed historic parks and gardens are designated on the Policies Map. These are considered to be non-designated heritage assets that would in future form part of a Local List and are therefore subject to this policy.

13.2.8 The concept of the significance of an asset is an important consideration in assessing and determining applications that may affect a heritage asset. The definition of significance is given in the National Planning Policy Framework and the various means by which the significance of an asset can be measured are set out in the [National Planning Practice Guidance \(Historic Environment\)](#). ~~Practice Guide to PPS5: Planning for the Historic Environment.~~

[In assessing applications involving heritage assets on the Heritage at Risk Register, positive regard will be had to the potential for proposals to reduce risk to any affected assets.](#)

##### *Heritage Statements*

A Heritage Statement should be submitted with planning applications [which will or are likely to impact heritage assets](#) to show how the proposal addresses this policy. The heritage statement should set out and address any impacts the proposed development may have on heritage assets.

In order that the degree of impact of a development proposal can be fully appreciated, it is essential that there is a full understanding of the asset and its significance, proportionate to its relative importance, against which to measure that

impact. An understanding of the context of the asset is also important to appreciate its place in the historical development pattern of the area. The primary source of data is the Historic Environment Record, a comprehensive data source covering all heritage assets, as well as evidence from previous recording activity, such as archaeological surveys and excavations, and antiquarian observations.

A desk-based assessment using relevant data sources may allow an understanding to be obtained of the significance of an asset. In some cases, this will be insufficient and further information will be required in order to assess the degree of impact of a development proposal. The collection of such information could take one of a number of forms as appropriate to the asset, including on-site evaluation, perhaps by trial trenching or geophysical survey in the case of buried archaeological sites, to more detailed building survey and selective removal of fabric such as plaster and other wall coverings. Such work should be carried out well in advance of the determination of an application so that their results can be given proper weight in decision-making.

The fact that heritage assets are irreplaceable means that great care must be taken when deciding on the destruction, either partial or total, of those assets. Even the most comprehensive record of an asset can never replace the asset itself. However, there will be occasions where other factors may dictate that a record is an acceptable alternative to the destruction of a heritage asset. Such a record should be in proportion to the significance of the asset itself and be carried out by suitably qualified people with provision for the publication of the results of the work to a wider audience.

#### *Bristol's heritage record*

Bristol's rich historic fabric of both buildings and landscapes is well documented. The council maintains various resources that can be used by applicants to help assess a proposal's historic context or the impact on any locally or nationally listed assets. These include:

- The Historic Environment Record (HER) – This is the primary resource for recording and managing the city's heritage. The majority of the HER's content can be viewed via the council's Know Your Place online platform.
- Character appraisals and conservation area enhancement statements – These documents provide an overview of the specific character of the areas of the city covered by conservation areas. They should be used to inform the design of proposals in the areas they cover.

In addition to these resources, the council has produced Our Inherited City, a strategy for managing Bristol's heritage. [This strategy sets out priorities for the city's historic environment with a focus on city and neighbourhood identities, consistent with the National Design Guide and National Model Design Code. The Council intends to update this strategy in 2025.](#) Applicants should refer to the Our Inherited City Heritage Statement Guidance (~~2020~~). This guidance has been prepared to assist developers, planners and other stakeholders engaged in projects that have the

potential to impact the historic environment. Details of listed buildings, both nationally and locally, can be found on the council's website.

#### *Energy efficiency measures and renewables*

The installation of renewable energy generation or energy efficiency measures into historic buildings, including those not listed or outside of conservation areas, can have significant benefits in terms of reducing their climate impact and ensuring their long-term usability. However, proposals should always be sensitive to the design, construction and heritage value of the proposal building. Further guidance on this will be provided in the council's design guide.

#### *Additional guidance*

The following adopted supplementary planning documents and supplementary planning guidance will continue to be used to guide decisions on development proposals:

- SPD7 'Archaeology and Development'
- SPD2 'A guide for designing house alterations and extensions'
- Urban Living SPD 'Making successful places at higher densities'
- PAN6 'Off-Street Residential Parking in Conservation Areas'
- PAN8 'Shopfront Guidelines'
- Conservation Area Character Appraisals and Enhancement Statements.

This guidance should be read in conjunction with the council's design guides and codes and may be subject to future update or replaced during the lifetime of the plan.

## Appendix 3: Historic England response to BCC draft SoCG (including council responses)

HE Hearing Statement re Policy DS1, DS1A, DS2, Site Allocations <https://www.bristol.gov.uk/files/documents/8733-ps4-476-historic-england>

HE Hearing Statement re Policy DC2 <https://www.bristol.gov.uk/files/documents/8758-ps13-476-historic-england#>

	HE concern	BCC response	Inspector's comments	BCC response	HE response	Outstanding disagreement	BCC response June 2025
<b>Site Allocations Issues 4.6</b>  <b>PQ13</b>	No evidence provided to demonstrate how heritage impacts were considered as required.	<p>BCC state heritage was considered when assessing allocations inc in accordance with HEAN3 (site allocations).</p> <p>Reassuring although no evidence has been shared to show how was undertaken and what the impacts were.</p>	Awaited			We await the Inspectors response to Historic England's concern.	The council has provided information relating to the selection of site allocations in the Development Management and Designations Process Topic Paper (TPC001).
<b>Policy DS1 City Centre</b>	"..referred to" not same as "great weight". Suggest a modification to replace former with the latter.	Tbc (opportunity to respond with a discrete mod)					A modification has been made to reflect this.

<b>Policy DSA1</b>	Opportunity to clarify ref in policy to a proposed tall building strategy	Tbc (oppo to provide a clarification in SOCG)					The council does not consider a tall building strategy to be required for the function of the relevant policies or for the soundness of the plan.
<b>Policy DC2: Tall buildings</b>	Recommend ref to City Design Guide and role of Our Inherited City (heritage strategy) in response to concern re lack of a tall building study that would identify those areas suitable in principle from a heritage perspective (an critical component of sustainable development), and a clear vision and strategy to demonstrate a plan led approach (justification)		Mods required in response to HE, and set out remaining disagreement	Mods proposed	At the Hearing, Inspector Louise Gibbons asked that BCC consider the HE suggestions that might address Historic England's SOUNDNESS concerns. Unfortunately, the proposed BCC mods fail to do so regarding a ref to and role of Our Inherited City and City Design Guide in informing the locations and design form of tall buildings.	HE considers that the proposed modifications fail to address the concerns previously expressed (particularly within the HE <a href="#">Hearing Statement</a> ) and our suggested modifications that may have addressed those SOUNDNESS matters.	The council considers the modification sufficient to outline the role of the strategy.
<b>PQ155</b>	Ref to Heritage Impact Assessment in		Inspector refers to additional ref to Townscape assessment.	Proposed mod to ref to townscape assessment.	Although ref to Townscape assessment is welcomed, this would not address heritage impact assessment that		The modification is sufficient and consistent with the

	addition to LVIA assessment				asses the impact on significance of individual heritage assets rather than the character and appearance of the townscape or as covered by LVIA. HE therefore requests ref to <u>Townscape/Heritage/Landscape and Visual Impact Assessments...</u>		inspectors' action notes (IN8).
<b>Policy CHE1: Conservation and the historic environment</b>			Mods to ensure consistent with NPPF and set out remaining disagreement	Mod 3 re 'less than substantial harm'.	<p>The proposed mod is unfortunately a selective ref to NPPF para 215 and as proposed is out of context. To be clear and be able to be appropriately understood and applied it should also refer to the preceding contextual NPPF paras 212-214.</p> <p>We strongly recommend, an alternative mod such as the following paraphrasing of NPPF para 212-215.</p>		The council has proposed a modification to this effect.

					<p><i>“When considering proposals, great weight will be given to the conservation of designated heritage assets, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to significance. Any harm requires clear and convincing justification including the level of public benefits.</i></p> <p>A previous BCC email dated 4 February 2025 had also proposed the following mod, and we wonder why this is no longer included?</p> <p><i>“Examples of public benefits may include:</i></p> <p><i>Sustaining or enhancing the significance of a heritage asset and the contribution of its setting.</i></p>	
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					<p><i>Reducing or removing risks to a heritage asset.</i></p> <p><i>Securing the optimum viable use of a heritage asset in support of its long-term conservation.</i></p>		
	Heritage at risk			Mod 5	noted		
	Our inherited city			Mod 6	noted		
	Non-designated heritage assets			Mod 7	noted		
	Ashton Ct Mansion			SOCG 3.6.2	noted		
	Heritage topic paper			SOCG 3.6.3	Noted, although we feel that if a Heritage topic paper had been produced it would have clearly set out relevant matters and focussed dialogue.		
<b>Policy DS4 Western harbour/ Cumberland Basin</b>				Mod 1 ref to Brunel's Swing Bridge	Welcomed		

<p><b>Policy DS2: Bristol Temple Quarter</b></p> <p><b>Issue 4.2</b></p>	<p>No ref to policy commitment to safeguarding setting, and therefore, significance of the iconic Bristol TM. Specific text suggested -</p> <p><i>“Future proposals must consider the careful location and height of buildings to safeguard the setting of Temple Meads, including the key views of the principal station building, the Brunel terminus and main train shed, particularly from the station approach ramp, and Bath Road.</i></p>				<p>Suggested variation</p> <p><i>“Any proposal will be expected to have regard to the historic significance of the Grade I listed Bristol Temple Meads Station and to safeguard its setting <u>particularly</u> with regard to the key views to and from the station buildings.</i></p> <p>The reason for this is that views are not the only issue when considering the setting of a heritage asset. See NPPF Glossary</p>		<p>The council has proposed a modification to this effect.</p>
<p><b>Site allocation SA202 Land to the west of Lodge Street</b></p>	<p>No heritage evidence. Ref to below ground archaeology</p>			<p>Ref to archaeology</p>	<p>Welcomed although no heritage evidence provided to demonstrate the significance of that archaeology and the</p>	<p>Welcomed although no heritage evidence provided to demonstrate</p>	<p>No longer relevant following removal of allocation.</p>

					impact of the allocation.	the significance of that archaeology and the impact of the allocation.	
<b>BDA1301 Stapleton allocation</b>	No evidence of considering heritage implications				No evidence provided	No evidence provided	The council does not consider the modification proposed to site allocation BDA1301 to be necessary, as the site allocation refers explicitly to the Stapleton and From Valley Conservation Area and any listed buildings proximate to the site.
<b>Policy E4: Avonmouth Industrial Area and Bristol Port/E5: Industrial and distribution areas</b>	Indicate the need to positively respond to the historic environment particularly below ground archaeology				HE notes that BCC considers our suggestion is unnecessary	HE notes that BCC considers our suggestion is unnecessary	
<b>Policy IDC1: Development contributions and CIL</b>	Include ref to CIL providing opportunities to support heritage.	Heritage improvements may be recipients of S106/CIL however ref			Although BCC consider that heritage improvements may be funded via S106/CIL, its	Although BCC consider that heritage improvements	The council does not consider this issue to be appropriate to address through the

	<p>CIL funds can be used for infrastructure that benefits heritage assets, and CIL itself can be used for maintenance and ongoing costs of heritage assets. Specifically, CIL can be used to support the restoration of vacant buildings at risk, maintenance of historic bridges, or the upkeep of parks and gardens.</p>	<p>in the policy is not appropriate/required.</p>			<p>own Planning Obligations SPD and <i>CIL &amp; S106 Process &amp; Guidance Notes (2023)</i>, make no ref to heritage and that is why Historic England feel it necessary and appropriate to refer in the LP, even if only in the explanatory text.</p>	<p>may be funded via S106/CIL, its own Planning Obligations SPD and <i>CIL &amp; S106 Process &amp; Guidance Notes (2023)</i>, make no ref to heritage and that is why Historic England feel it necessary and appropriate to make reference in the LP, even if only in the explanatory text.</p>	<p>local plan as outlined in the SoCG.</p>
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