



Bristol Local Plan
Submission to Secretary of State
Regulation 22(1)(c)
Statement of Consultation
April 2024



Contents

Introduction.....	3
Number of representations made on Local Plan Publication Version	7
Main issues raised in representations to Local Plan Publication Version	8
General issues.....	8
Vision: Building a better Bristol	8
Aims and Objectives	9
Development strategy	10
Infrastructure, Developer Contributions and Social Value	25
Urban Living: Making the best use of the city’s land	26
Housing.....	30
Economy	44
Centres, shopping and the evening economy	49
Biodiversity and Green Infrastructure.....	54
Transport	73
Community facilities.....	75
Net zero and climate	78
Design and Conservation.....	88
Health, wellbeing and food sustainability	95
Utilities and Minerals	99
Development allocations.....	99
Omissions	112
Appendix: Local Plan Publication Version (November 2023) Regulation 19 Statement of Consultation	1

Introduction

Purpose of document

This document sets out how Bristol City Council has sought participation from communities and stakeholders during preparation of its Local Plan in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

It meets Regulation 22(1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the council's Statement of Community Involvement (approved November 2015).

Regulation 22(1)(c) requires the submission to the Secretary of State of a statement setting out:

1. which bodies and persons the local planning authority invited to make representations under Regulation 18;
2. how those bodies and persons were invited to make representations under Regulation 18;
3. a summary of the main issues raised by the representations made pursuant to Regulation 18;
4. how any representations made pursuant to Regulation 18 have been taken into account;
5. if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
6. if no representations were made in Regulation 20, that no such representations were made.

This statement should be read alongside the Bristol Local Plan Publication Version (November 2023) Consultation Statement, provided as an Appendix to this document. This contains information which addresses points 1-4 above.

Information which addresses point 5 is provided below, from page 7. Point 6 is not applicable as representations were made pursuant to Regulation 20.

Preparation of new Local Plan – overview

The council's existing Local Plan comprises:

- Core Strategy (adopted 2011)
- Site Allocations and Development Management Policies (2014)
- Bristol Central Area Plan (2015).

To provide a new Local Plan for Bristol there have been three main stages in the review of the above documents:

- Stage 1 – Local Plan Review: Consultation document (2018)
- Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation document (2019)
- Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further Consultation document (2022).

A variety of engagement techniques was used throughout the preparation process in accordance with the Statement of Community Involvement. More detail on these methods is provided in the Local Plan Publication Version Consultation Statement – see Section 3 of the Appendix to this document.

Stage 1 – Local Plan Review: Consultation document (2018)

In February 2018 the council published the ‘Bristol Local Plan Review – Consultation’ document for comment.

As the Core Strategy had been adopted in 2011, one of the main aims of the 2018 document was to seek views on how the city’s strategic housing needs could be met over the new plan period to 2036.

These needs had been identified in the West of England Joint Spatial Plan. Prepared by Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire Councils, the Joint Spatial Plan included a requirement of 33,500 new and affordable homes to be delivered in Bristol by 2036.

The other main aim of the 2018 document was to seek comment on the updating of a number of existing Local Plan policies. This updating was necessary to reflect changes to national planning policy and local issues since the adoption of the Core Strategy. Initial proposals for the approach to the management and provision of specialist forms of housing, economic development and employment land, climate change, health and wellbeing and open space protection were set out for comment.

Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation document (2019)

In March 2019 the council published the ‘Bristol Local Plan Review – Draft Policies and Development Allocations – Consultation’ document for comment.

This document had been informed by responses to the 2018 consultation and was published in the context of the Joint Spatial Plan, which had reached the examination stage.

The 2019 consultation document contained draft policies relating to the proposed development strategy, infrastructure contributions, urban living, housing, economy, green infrastructure, transport, climate change, design and conservation, and health and well-being. It was supported by an Annex containing proposed allocations for new homes, industrial or mixed-use development. A document setting out sites proposed for Local Green Space and Reserved Open Space protection was also published.

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further Consultation document (2022)

In November 2022 the council published the ‘Bristol Local Plan Review – Draft Policies and Development Allocations – Further consultation’ document for comment.

One of the main aims of the document was to set out the strategic planning context for the Local Plan, looking ahead to 2040. This followed the Joint Spatial Plan’s withdrawal from examination in April 2020 and work being discontinued on the West of England Combined Authority’s Spatial Development Strategy.

Due to the passage of time and changing strategic context it was also necessary to further update existing Local Plan policies. Comment was sought on draft policies relating to housing provision, affordable housing, net zero and climate change, biodiversity and nature recovery, food sustainability, shopping, centres and the evening economy, design and development locations and allocations.

Publication of new Local Plan for representations

Informed by engagement during the preparation stages and following approval at the 31st October 2023 Full Council meeting, the new Local Plan was published in November 2023 for representations to be made ahead of it being submitted to the Secretary of State for independent examination.

The new Local Plan will replace the existing Core Strategy (2011), Site Allocations and Development Management Policies (2014) and Bristol Central Area Plan (2015). It provides a positive vision for the future of the city, looking ahead to 2040. It contains strategic policies to address the council’s priorities for the development and use of land in the city.

It sets out an overall strategy for the pattern, scale and design quality of places, and makes provision for housing (including affordable housing), employment, retail, leisure and other commercial development; infrastructure for transport, telecommunications, flood risk; community facilities; and conservation and enhancement of the natural, built and historic environment, including green infrastructure, and planning measures to address climate change mitigation and adaptation.

Publicity carried out to invite representations

The Local Plan Publication Version and other ‘proposed submission documents’ were published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on Tuesday 21st November 2023 with representations invited until Friday 26th January 2024, a period of nine weeks and three days.

In accordance with the Statement of Community Involvement, copies of the proposed submission documents and the statement of the representations procedure were made available for inspection at City Hall and on the council’s website.

A statement of the representations procedure and a statement of the fact that the proposed submission documents were available for inspection and of the places and times at which they could be inspected was sent to each of the specific and general consultation bodies invited to make representations at regulation 18(1). This was carried out as part of emails and letters sent to members of the Bristol Local Plan Consultation Database on 21st November notifying them of the publication of the Local Plan. The database contains approximately 2,500 residents, businesses, groups, organisations, statutory consultees, BCC Councillors and other parties who have expressed an interest in being involved in preparing the Local Plan.

Representations were invited to be made using a survey form on the council's 'Ask Bristol' online consultation and engagement hub. Representation Forms were also made available in Microsoft Word format to download on the council's Planning Policy web pages so that representations could also be made via email or post.

Information about the Local Plan Publication Version and how to make representations was emailed to the Bristol Neighbourhood Planning Network on 21st November with a request that it be placed on its website and / or circulated to its members, who number approximately 55 local groups and organisations.

Articles were published about the Local Plan Publication Version in a number of news outlets following its approval at the 31st October 2023 Full Council meeting. This included coverage on BBC Bristol's news webpage (2nd and 3rd November) and the Bristol Post (1st November).

Officers attended meetings of the following groups and organisations to present information about the Local Plan Publication Version and answer questions:

- 28th November 2023 – Bristol Neighbourhood Planning Network liaison meeting at City Hall, College Green
- 18th December – online meeting with Bristol Civic Society
- 11th January 2024 – presentation to Bristol BID Board members at City Hall, College Green
- 16th January – public meeting at St Philip's Marsh nursery school, Albert Crescent, St Philip's Marsh
- 17th January – public meeting at Holy Trinity Church Clifton Vale, Hotwells
- 17th January – presentation to Business West PT and CC Group at 1 Portwall Lane, Redcliffe
- 17th January – public meeting at St Marks Baptist Church, St Marks Road, Easton
- 18th January – public meeting at Wellspring Settlement, Ducie Rd, Barton Hill.

Number of representations made on Local Plan Publication Version

A total of 1,634 representations were made by 436 respondents during the representations period of Tuesday 21st November 2023 to Friday 26th January 2024. The representations received can be viewed on the council's website: [Local plan review \(bristol.gov.uk\)](https://www.bristol.gov.uk/local-plan-review)

Main issues raised in representations to Local Plan Publication Version

A summary of the main issues raised on the Local Plan Publication Version is set out below.

General issues

Maintaining effective cooperation

- Concern that the council had not met its duty to cooperate with adjoining local planning authorities on strategic policy matters was raised:
 - In relation to how unmet housing need in Bristol would be accommodated in neighbouring authority areas, the absence of a statement of common ground which detailed an agreed approach to meeting this need was noted by representors from the housing development industry / landowners.
 - SevernNet (Representor Ref. No. 389) thought there had been inadequate cross-boundary coordination regarding the Portbury, Avonmouth and Severnside areas. They felt that, by focussing on Avonmouth rather than also considering Portbury in North Somerset and Severnside in South Gloucestershire, opportunities had been missed to provide a more positive strategy for the area as a whole, for example by identifying common opportunities and challenges such as transport and infrastructure requirements.
 - David Gray (303) considered there had been a failure to carry out cross-boundary work on reducing transport-related air pollution, commuting and carbon emissions.

Habitats Regulations Assessment

- Natural England (489) noted that the appropriate assessment stage of the Habitats Regulations Assessment (HRA) would be completed prior to examination. They pointed out that the HRA Screening Report had concluded that the local plan could result in likely significant effects on Habitats Sites from a number of threats / pressures. They stated that the council will need to satisfy itself that any adverse effects on the integrity of Habitats Sites can be mitigated or avoided where likely significant effects have been identified. They advised that they would be happy to discuss the HRA further in due course.

Vision: Building a better Bristol

Representations received (for both Vision and Aims & Objectives sections): 42
Object: 32 Support: 10

- Most representations came from individuals stating their objection to rapid transit network proposals, particularly for building an underground system.
- Other representors suggested alternative visions, with most emphasising environmental and social sustainability considerations.
- A number of representors from the housing development industry considered the Vision's reference to housing provision lacked ambition as was based on an inaccurate assessment of need. In contrast, CPRE Avon and Bristol (492) expressed concern at the focus on housing and sought a broader vision which emphasised climate change adaption and mitigation.
- Specific matters for inclusion were suggested by respondents. For example, a stronger focus was sought by some on innovation, community involvement and design, economic growth and the development of new work space, while others sought reference to market housing, reducing car use, space for wildlife, less student accommodation and ensuring safety.
- Several respondents thought the Vision lacked clarity.

Aims and Objectives

- A number of respondents from the housing development industry / landowners disagreed with the objective to deliver at least 1,925 new homes a year as they considered it was based on an underestimate of need. In contrast, CPRE Avon and Bristol (492) thought the objective should be amended to refer to appropriate housing targets informed by climate, demographic, economic and environmental changes.
- An objective for the council to work with neighbouring authorities to accommodate unmet housing need was sought by Crest Nicholson Partnerships and Strategic Land (278).
- Inclusion of an objective to develop and renew workspace through intensification and delivery of new office, industry and distribution floorspace across the city was advocated by Royal London Asset Management (494).
- Additional objectives relating to reducing commuter mileage and implementing the duty to cooperate were suggested by David Gray (303).
- The '15-minute city' aim should be replaced according to Bristol Parks Forum (495) as they thought the concept was no longer supported by Government. The Forum favoured a 10-minute city aim.
- An aim for the local plan to establish a planning approach which contributes to the achievement of sustainable development in a sustainable manner was recommended by Bristol Parks Forum (495).
- National Highways (473) thought the objective relating to new infrastructure should be supported by evidence of its deliverability.

Development strategy

Chapter-wide issues

- Support for the principles of the development strategy was made by University Hospitals Bristol and Weston NHS Foundation Trust (250). They considered that housing growth must be accompanied by sufficient new healthcare (and other social) infrastructure.
- Adding text to each Development Strategy policy to ensure new development provides appropriate supporting healthcare infrastructure was requested by NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468).
- The approach to the growth and regeneration areas lacked clarity and certainty regarding the provision of adequate employment land and uses according to Business West and the Bristol Property Agents Association (477). They sought strengthened policy to protect and provide employment uses in these areas, including floorspace targets and binding masterplans on the levels and type of employment space to be provided.
- Concerns were expressed by Business West and the Bristol Property Agents Association (477) that there could be negative spatial implications resulting from the development strategy:
 - They felt an imbalance in industrial land provision could result from providing new allocations at Avonmouth rather than other areas;
 - They feared a potential under-provision of city centre office floor space could lead to the loss of potential future occupiers to competitor cities.
- The potential displacement of established jobs from central and inner Bristol to more inaccessible locations was of concern to Bristol Civic Society (285). They felt it could have impacts on sustaining inclusive communities. Fears related to:
 - increased commuting distances;
 - reduced local employment opportunities suitable for the skills held by people in these locations;
 - the potential ineffectiveness of the proposed spatial frameworks in the growth and regeneration areas to ensure adequate employment provision.
- Kevin Chidgey (345) was concerned about the potential negative impacts of the development strategy's area policies on existing businesses and jobs.
- Objection to the approach of the development strategy as a whole was made by Dandara Living Developments Ltd (430) and Redrow Homes Ltd (369) as they considered it was not based on objectively assessed housing need.
- The lack of a modelling assessment of the impact of the development strategy on the strategic road network meant that National Highways (473) were unable to comment on the appropriateness of the strategy or its area policies.

- A perceived lack of clarity on the scale of non-residential development proposed within each development strategy area was raised by National Highways (473), while Kevin Chidgey (345) also expressed concern about this in relation to the type and scale of development to be provided in these areas.
- Clarity on the status of the blue shaded box and text on p.54 entitled 'Proposals adjacent to Bristol' was sought by North Somerset Council (188). They considered it did not accord with revised national planning policy or the approach being taken in the North Somerset Pre-Submission Local Plan which no longer contained the scale of growth close to the Bristol boundary as previously proposed.
- The requirements of Policy BG5 'Biodiversity and access to Bristol's waterways' should be more explicitly referred to within development strategy Policies DS1 – DS14 according to Dandara Living Developments Ltd (430).
- Inconsistency between Development Strategy areas over how parks and green spaces were shown on the Policies Map was the view of Bristol Parks Forum (495), who pointed to Lockleaze where green areas were shown, and Western Harbour, where they were not.

Central Bristol

Policy DS1: Bristol City Centre

Representations received: 29 Object: 26 Support: 3

- Strengthening the policy to require development to enhance the nature recovery network and provide green and blue infrastructure for climate resilience / adaptation was sought by Natural England (489).
- Detailed policy wording on the flood risk-related requirements of new development proposals was requested by the Environment Agency (465). Mention of flood risk mitigation was also sought, while concern was raised at the appropriateness of active ground floor uses in flood risk areas. The Agency also thought 'Agent of change' text should be included within the policy wording.
- NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468) thought the policy's reference to encouraging new hospital facilities should be expanded to include wider healthcare facilities such as GPs surgeries.
- A provision to ensure development proposals do not impede the consolidation and expansion of university and hospital facilities within their precincts was sought by the University of Bristol (487).
- Specific reference to student accommodation as a supported land use was requested by the University of the West of England (408), Abrdn Plc (440) and Bristol Alliance Limited Partnership (442). Centrica Combined Investment Fund c/o LaSalle Investment Management (429) sought this reference in the 'Broadmead' section.
- Reference to 'carefully managing' purpose-built student accommodation was objected to by Dandara Living Developments Ltd (430) as too negatively worded.

- The inclusion of Hotwells, Cliftonwood and Western Harbour within the city centre boundary was objected to by several respondents including Hotwells and Cliftonwood Community Association (261) on the grounds that they were not considered to have 'city centre' characteristics.
- Bristol Parks Forum (495) thought that the policy's ninth bullet point should specify that development will include a large multifunctional green park.
- Insufficient reference to protecting night time economy venues, such as music venues, night clubs and pubs, was the concern of NightWatch (368).
- Reference to cultural provision in the policy's 'Culture and diversity of uses' section was objected to by Centrica Combined Investment Fund c/o LaSalle Investment Management (429) and AEW Real Estate Investment Trust (435) on the grounds of ambiguity.
- The expectation that the design of development should accord with local design guides and codes was opposed by AEW Real Estate Investment Trust (435) as they had not yet been published. They also thought that, as the codes and guidance will not be subject to independent examination, reference to development according with them was inappropriate as they will not have development plan status.
- The requirement for new development to provide supporting infrastructure, services, community facilities and transport system improvements was objected to by Abrdn Plc (440) as they felt it could impact scheme viability.
- The Parochial Church Council of St Mary Redcliffe (399) thought St Mary Redcliffe church should be referenced as a key community facility and place of worship, while Science Creates (445) thought the policy should mention the provision of affordable industrial space.
- University Hospitals Bristol and Weston NHS Foundation Trust (250) objected to the omission of the city centre hospital precinct being defined on the Policies Map. Similarly, the University of Bristol (487) objected to its sites relating to this policy not being shown on the Policies Map.

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

Representations received: 17 Object: 15 Support: 2

- The expectation that development should accord with the City Centre Development and Delivery Plan (CCDDP) was objected to by Centrica Combined Investment Fund c/o LaSalle Investment Management (429), AEW Real Estate Investment Trust (435) and Bristol Alliance Limited Partnership (442). They considered it unreasonable to assign development plan status to the CCDDP as it will not be subject to independent examination and could include provisions which impact scheme viability.
- Specific reference to student accommodation as a supported land use was sought by Centrica Combined Investment Fund c/o LaSalle Investment Management (429) and Bristol Alliance Limited Partnership (442).

- The appropriateness of requiring new development to include unspecified supporting infrastructure, services and community facilities was questioned by Bristol Alliance Limited Partnership (442) and AEW Real Estate Investment Trust (435) due to a lack of evidence that it would not impact scheme viability.
- The provision seeking 10% of ground floor space for community groups was opposed by Dandara Living Developments Ltd (430), AEW UK Investment Management (458), AEW Real Estate Investment Trust (435), Fusion Group (396) and Bristol Alliance Limited Partnership (442) owing to insufficient evidence to demonstrate demand and appropriateness as well as potential impacts on scheme viability.
- The approach to the provision of student accommodation was objected to by the University of Bristol (487), in particular the policy's link with Policy H7 'Managing the development of purpose-built student accommodation' and its 750 bed space limit for Broadmead.
- The Environment Agency (465) thought that, as much of the policy area is in Flood Zone 2, reference should be made to development requiring an appropriate flood risk assessment and passing the sequential test.
- The expectation that development adjacent to Castle Park should contribute to the park's enhancement was opposed by AEW Real Estate Investment Trust (435) as they thought it did not accord with legislation concerning planning obligations.
- Strengthening the policy's 'Place Principles' with references to increasing green and blue infrastructure and natural features was sought by Natural England (489). They also felt the policy should expect nearby development to contribute to the maintenance of Castle Park to cope with additional visitor pressure.
- The lack of a vision for St James' Barton roundabout was seen as a missed opportunity by Bristol Business Improvement Districts (423).
- Reference to the presence and future retention of hospital facilities within the policy area was requested by University Hospitals Bristol and Weston NHS Foundation Trust (250).
- The policy's approach to tall buildings in Broadmead was of concern to Kevin Chidgey (345).

Policy DS2: Bristol Temple Quarter

Representations received: 20 Object: 14 Support: 6

- Highlighting within the policy text the key green infrastructure and biodiversity opportunities and ambitions for each of the policy's sub-areas was requested by Natural England (489). They also felt the policy should require development in waterside locations to provide accessibility and biodiversity improvements.
- Greater emphasis in the policy on the emerging masterplan was sought by Marble Mosaic Co. Ltd (371).
- The 2,500 homes estimated capacity figure referred to in the policy's explanatory text was objected to by Marble Mosaic Co. Ltd (371). They considered the

appropriate capacity figure would be identified as part of the masterplan process but that, if such a figure was to be included, it should be described as a minimum.

- Concern regarding the boundary of the policy area was raised by two representors:
 - Change Real Estate and Abri (425) thought it should be amended to be consistent with the Enterprise Zone boundary.
 - Royal London Asset Management (494) pointed out that their 'Distillery' site on Temple Way (formerly known as Glassfields) fell within the policy area boundary but outside that covered by the Temple Quarter Development Framework (April 2023) boundary. They were concerned therefore that their site did not have up-to-date design guidance. They thought policy text was needed to make clear that sites outside the development framework or masterplan boundary should optimise density and make effective and efficient use of the land.
- The policy's requirement for development to be supported by a sequential test was objected to by Dandara Living Developments Ltd (430).
- Reference to proposals being expected to accord with approved development frameworks was opposed by Unite Group Plc (457). They considered this inappropriate as it raised the decision-making status of framework documents which had not been subject to independent examination.
- The policy's provision that individual development proposals should not prejudice the comprehensive regeneration of the area was objected to by Unite Group Plc (457). They thought this had the potential to stifle development particularly due to the fractured nature of landownership in the area.
- A lack of information on how financial contributions to flood defences would be calculated concerned Unite Group Plc (457) owing to the potential impacts on scheme viability.
- Including text which supported the intensification or adaptive re-use of existing buildings for alternative uses was requested by CBRE Investment Management (471).
- Specific text to ensure the setting of Temple Meads station was safeguarded by development proposals was sought by Historic England (476).

Policy DS3: St Philip's Marsh

Representations received: 19 Object: 16 Support: 3

- The inclusion of specific requirements and targets for green and blue infrastructure in the policy area was sought by Natural England (489), who also thought the policy should require greenspaces to be biodiverse and contribute to the city's nature networks.
- A lack of clarity regarding the scale of development proposed at St. Philip's Marsh was raised by National Highways (473). They were concerned that, as the

quantum of development had not been defined, the impact on the strategic road network could not be determined.

- Bristol Parks Forum (495) thought that the policy should specify that development will include a large multifunctional green park which was both publicly accessible and owned.
- Reference to fluvial flooding in the policy text was requested by the Environment Agency (465).
- Rather than the area being regenerated to complement the development of the adjacent Bristol Temple Quarter, St Philip's Marsh Community Group (305) favoured a mixed-use approach which complemented the evolving nature of the industrial, business and commercial use of the area.
- Detail concerning the financial arrangements and timeframes for the delivery of the strategic flood mitigation works referred to in the policy was sought by Structadene (455) and Conygar Bristol Ltd (403).
- The policy's reference to ensuring the number of jobs supported by the area is increased was questioned by Structadene (455) regarding how it would be applied in assessing individual proposals.
- Improved labelling of the sub-areas shown on the map accompanying the policy was sought by Structadene (455).
- To emphasise the role of the masterplan process, the removal of wording relating to the proposed land uses for the policy's sub-areas was advocated by Structadene (455) or, alternatively, amending it to ensure greater flexibility. Dandara Living Developments Ltd (430) were similarly concerned, considering the proposed uses were not justified due to the absence of a strategic sequential test.
- The policy provision that new development should facilitate and contribute towards the delivery of eastern access to Temple Meads Station was questioned by Structadene (455) on the grounds of a lack of clarity owing to the eastern access not being within the St Philip's Marsh policy area.
- Reference to the need for a comprehensive approach to traffic management and connectivity was sought by Structadene (455).
- Within the North West St Philip's Marsh section, specific reference to support for residential and student accommodation development was requested by Dandara Living Developments Ltd (430) and Structadene (455). Similarly, Cubex Ltd (453) thought text which supported development associated with the University of Bristol's Enterprise Campus should be specified, such as student accommodation and workspace.
- Within the South St Philip's Marsh section, specific policy support for purpose-built student accommodation was requested by Bristol Animal Rescue Centre (252), while Conygar Bristol Ltd (403) were concerned that the policy could be interpreted as directing a greater extent of development to riverside sites in comparison with non-riverside locations.

- Including policy text which would allow the relocation of existing businesses and / or community assets to a suitable alternative location was proposed by Bristol Animal Rescue Centre (252) in order to provide flexibility for redevelopment proposals.
- Regarding the policy's provision that individual development proposals should not prejudice the comprehensive regeneration of the area, Bristol Animal Rescue Centre (252) considered the policy should include commentary on how individual applications submitted in advance of a masterplan would be assessed.
- Including references to the 'agent of change' principle in the policy text was requested by Bristol Animal Rescue Centre (252).
- Policy wording to explain how individual proposals can come forward ahead of a comprehensive flood mitigation scheme was sought by Bristol Animal Rescue Centre (252).
- The policy's provision that individual development proposals should not prejudice the comprehensive regeneration of the area was objected to by Unite Group Plc (457). They thought this had the potential to stifle development particularly due to the fractured nature of landownership in the area.
- A lack of information on how financial contributions to flood defences would be calculated concerned Unite Group Plc (457) owing to the potential impacts on scheme viability.
- The presence of 132kV overhead power lines to the east of the policy area was highlighted by National Grid Electricity Distribution (South West) (84). They thought the policy should include reference to safeguarding the retained power lines and incorporating them sensitively into development proposals.
- Changes to the policy's approach to affordable housing provision were sought by Conygar Bristol Ltd (403) to reflect evidence indicating lower sales values in comparison with other central Bristol growth and regeneration areas.
- A concern about the potential for existing jobs to be lost in the area was expressed by ElhPlan (404) who sought clarity on where they would be re-located.

Policy DS4: Western Harbour

Representations received: 34 Object: 32 Support: 2

- Most representations objected to the policy due to concerns about flood risk; the ability to accommodate potentially large numbers of new homes; the possible loss of valued local features including community / recreational facilities, historic assets, character, wildlife sites / corridors, open spaces and views; and air and water pollution arising from new development. It was also felt that the policy was inappropriate because the area was not considered to have 'city centre' characteristics.
- Concerns were also widely expressed about a perceived lack of engagement with local residents in developing the policy, as well as the differing boundaries of the

area shown in the Local Plan and emerging 'Harbour Hopes' masterplanning project.

- A request for the policy to set clear principles to inform the proposed masterplan work was made by Sandra and Ian Fryer (316).
- A lack of clarity on the timing of proposed transport infrastructure improvements was a concern of Esteban Investment Ltd (420) in relation to its 'Longmoor Village' housing development at Ashton Vale and the associated mixed use scheme at Ashton Gate.
- Reference in the policy to the area being at high risk of tidal flooding was sought by the Environment Agency (465). They also requested provisions to ensure new development was set back eight metres from watercourses and related structures.
- Specific policy wording in support of student accommodation was requested by the University of Bristol (487), who considered that such wording should not include a bed space limit.
- Strengthening the policy by identifying specific green and blue infrastructure and nature recovery ambitions was suggested by Natural England (489).
- Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).

Policy DS5: Frome Gateway

Representations received: 14 Object: 14 Support: 0

- Concerns about flood risk were raised by the Environment Agency (465), who sought stronger policy wording regarding the requirements development proposals should meet.
- Including in the policy the Frome Gateway Regeneration Framework's target for providing one hectare of new open space was requested by Natural England (489), along with reference to the expected green infrastructure enhancements and how these would be designed in consultation with the local community.
- Reference to a 500 bed space limit for student accommodation was objected to by Orangestar Capital (Globe Bristol) Ltd (441) and Dandara Living Developments Ltd (430) on the grounds of not meeting identified need. The latter representor also considered the limit inflexible and inconsistent with the policy approach of other growth and regeneration areas.
- The reference to an estimated 1,000 homes capacity of this area was opposed by Dandara Living Developments Ltd (430) as it was considered inconsistent with the approach to other growth and regeneration areas.
- The requirement for three and four bedroom homes was objected to by Dandara Living Developments Ltd (430) due to concerns about a lack of evidence and inconsistency with similar area policies where mix was not specified.

- The policy's requirement for development to be supported by a sequential test was objected to by Dandara Living Developments Ltd (430). This was on the basis of a perceived inconsistency with references to development being in accordance with the regeneration framework which would identify appropriate land uses.
- A lack of reference to support for build to rent housing was of concern to Dandara Living Developments Ltd (430), who felt it was inconsistent with the approach taken in Policy DS3 'St Philip's Marsh' where it was specified.
- Greater prominence and reference to the Old Market Quarter Neighbourhood Development Plan was sought by the Old Market Community Association (233). Dandara Living Developments Ltd (430) thought that reference to development being consistent with the neighbourhood plan should also state that this will only be the case where the neighbourhood plan remains up to date.
- Referring to the policy requirements of Policy BG7 'St Paul's Green Link' as they relate to Frome Gateway was advocated by Dandara Living Developments Ltd (430).
- Concerns about impacts on scheme viability resulting from the expectation that new development should contribute to various policy provisions was raised by Orangestar Capital (Globe Bristol) Ltd (441).
- Specific reference to development including provision of light industrial, research and development and maker spaces was advocated by Science Creates (445).
- The reference to logistics provision adjacent to M32 Junction 3 was questioned by ElhPlan (404), who considered it should be focussed in St Philip's Marsh using rail connections.
- A concern about the potential for existing jobs to be lost in the area was expressed by ElhPlan (404) who sought clarity on where they would be re-located.
- Policy protection of cultural and 24 Hour economy venues and uses in this location was requested by NightWatch (368).

East Bristol

Policy DS6: Lawrence Hill

Representations received: 5 Object: 5 Support: 0

- The affordable housing requirement referred to in the policy text was objected to by Frank Bruce and Company Limited (493) citing concerns about potential impacts on scheme viability.
- Specific reference to development including provision of light industrial, research and development and maker spaces was advocated by Science Creates (445).
- Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).

- An amendment to the ‘development framework’ reference was sought by Frank Bruce and Company Limited (493). They requested that the text allows for more than one such framework to be developed as they felt this could lead to a more effective approach to regeneration through the faster production of more targeted frameworks.
- The estimated housing capacity for the area provided in para. 3.2.8 was objected to by Frank Bruce and Company Limited (493) as they considered it too low.
- A concern about the potential for existing jobs to be lost in the area was expressed by ElhPlan (404) who sought clarity on where they would be re-located.

Policy DS7: Central Fishponds

Representations received: 10 Object: 9 Support: 1

- The need to understand the impacts on local infrastructure of higher housing densities was raised by Fishponds Community Planning Group (190). Similarly, Andrew Barclay (19) was concerned about the potential negative impacts of new housing on traffic congestion.
- The importance of new development relating well to neighbouring streets in terms of scale and design was raised by Fishponds Community Planning Group (190), who were concerned at the appropriateness of possible tall buildings given the area’s existing character of predominantly two-storey residential dwellings.
- Reference to an estimated 1,500 new homes capacity was objected to by Castel Ltd (382) who thought a minimum of 2,600 should be specified, while Central Fishponds Ltd (405) thought the figure for the Atlas Place area should be specified as at least 2,000. In contrast, Fishponds Community Planning Group (190) supported the 1,500 homes estimate provided it was based on an adequate assessment of the health and educational infrastructure required to support that homes growth.
- Castel Ltd (382) and Central Fishponds Ltd (405) thought that the policy’s references to ‘a regeneration framework’ should be amended to ‘the Atlas Place Framework’.
- Changes to the policy’s approach to affordable housing and workspace provision were sought by Central Fishponds Ltd (405) to reflect evidence indicating lower sales values in comparison with other growth and regeneration areas.
- Splitting the policy area into two was suggested by Central Fishponds Ltd (405) and Graphic Packaging International Ltd (436). They thought the ‘Atlas Place’ area associated with their sites should be separated from the wider policy area boundary north of the Railway Path.
- Concerns about the impact on scheme viability regarding the policy requirement for new workspace was raised by Central Fishponds Ltd (405).

- The policy's housing mix stipulations were considered superfluous by Central Fishponds Ltd (405) as they thought this issue would be addressed under Policy H4 'Housing type and mix'.
- Specific reference to development including provision of light industrial, research and development and maker spaces was advocated by Science Creates (445).
- Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).
- The reference to seeking an inner urban style density of 100 dwellings per hectares as a minimum was objected to by Graphic Packaging International Ltd (436). They felt this would require large-scale schemes which could prevent other policy provisions from being secured, namely an appropriate housing mix and a suitable response to surrounding context, which contained low rise residential development.

South Bristol

- University Hospitals Bristol and Weston NHS Foundation Trust (250) considered that significant housing growth in South Bristol must be accompanied by sufficient new healthcare (and other) social infrastructure.
- WeCanMake (446) sought supportive reference in this section to its project (and associated Community Design Code) which is aiming to meet housing need through the delivery of community-led one and two bedroom housing developments in private gardens.

Policy DS8: Central Bedminster

Representations received: 9 Object: 8 Support: 1

- Reference to a 1,600 bed space limit for student accommodation was objected to by the University of Bristol (487) and Dandara Living Developments Ltd (430) on the grounds of inflexibility, with the latter representor also considering the cap as not meeting identified need and being inconsistent with the policy approach of other growth and regeneration areas.
- A lack of reference to support for build to rent housing was of concern to Dandara Living Developments Ltd (430), who felt it was inconsistent with the approach taken in Policy DS3 'St Philip's Marsh' where it was specified.
- The requirement for development to be supported by a sequential test was objected to by Dandara Living Developments Ltd (430). This was on the basis of a perceived inconsistency with references to development being in accordance with regeneration frameworks which would identify appropriate land uses.
- Requiring proposals for sites previously used for business purposes to provide an appropriate form and amount of new workspace was opposed by Dandara Living Developments Ltd (430) as unjustified.

- The minimum density levels suggested in the explanatory text were objected to by Dandara Living Developments Ltd (430) as they were considered too low to deliver the required amount of development.
- Reference in supporting text to development being guided by design criteria set out in the Urban Living supplementary planning document was objected to by Dandara Living Developments Ltd (430) as it was considered inconsistent with the approach to other growth and regeneration areas.
- Policy text which provides for the retention or relocation of existing businesses and tenants within the Central Bedminster Area was requested by S&B Automotive Academy (358).
- Text to ensure development is set back eight metres from the River Malago was sought by the Environment Agency (465).
- Policy protection for cultural and 24 Hour economy venues and uses in this location was requested by NightWatch (368).

Policy DS9: Brislington

Representations received (for both Policy DS9 and Hengrove & Knowle West): 6

Object: 6 Support: 0

- References to flood risk and the requirements for development to include a flood risk assessment and be set back eight metres from Brislington Brook were sought by the Environment Agency (465).
- Specific reference to development including provision of light industrial, research and development and maker spaces was advocated by Science Creates (445).
- Wording to ensure the retention and provision of wildlife corridors and stepping stones was sought by Bristol Parks Forum (495).
- A failure to allocate a site within the policy area for residential development was objected to by Industrial Gas Services SW (242).

Hengrove and Knowle West

- References to the requirements for development to include a flood risk assessment and be set back eight metres from Brislington Brook and Pigeonhouse Stream were sought by the Environment Agency (465).
- Additional wording to paragraph 3.3.22 to provide more information on the Knowle West Regeneration Framework was sought by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).

Policy DS10: The Green Belt

Representations received: 32 Object: 9 Support: 23

- Redrow Homes Ltd (369) objected to this policy on the grounds that it had not been informed by a comprehensive review of the Green Belt therefore it was unclear why certain sites had been selected for removal from Green Belt designation.

- A failure to allocate land at Yew Tree Farm for residential development was objected to by Redrow Homes Ltd (369), whereas support for maintaining its Green Belt designation was received from Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Martyn Cordey (359), Fran Whitlock (110), Julia Halpenny (113), Sue Chubb (124), Nick Smith (293), Jim Mayger (97), Anna Tucker (98), June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Thomas Lewis (111), Luke Collins (152), Catherine Withers (153), Bridget Bennett (154), Hilary Rydon (156), Richard Sawyer (165) and Alison Parker (333).
- Chapel Hill Homes (433) sought removal of land to the south of Ponderosa, Bridgwater Road from the Green Belt.
- Barrs Court Holdings Ltd (481) thought that land to the south of Ironmould Lane, Brislington should be removed from the Green Belt to accommodate housing development.
- Objection to the policy's removal from the Green Belt of sites described under Policies DS11 and DS12 was made by Manor Woods Valley Group (63), while Save Ashton Vale Environment (SAVE) (235) objected to the proposed housing allocation on the area shown on p.29 of the Policies Map as 'DS11-1'.
- Concerns that the exceptional circumstances justifying the removal of sites from the Green Belt for housing allocations had not been set out in the policy were raised by Esteban Investments Ltd (420) and Save Ashton Vale Environment (SAVE) (235).
- Ensuring the policy reflects opportunities to use the greenbelt more positively for environmental and social benefits was recommended by Natural England (489).

Policy DS11: Development allocations – south west Bristol

Representations received: 31 Object: 31 Support: 0

- The proposed allocations were objected to by Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Jim Mayger (97), Anna Tucker (98), Fran Whitlock (110), Julia Halpenny (113), Sue Chubb (124), Catherine Withers (153), Nick Smith (293), Manor Woods Valley Group (63), Martyn Cordey (359), June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Thomas Lewis (111), Bridget Bennett (154), Hilary Rydon (156) and Richard Sawyer (165).
- Re. the proposed housing allocation for land at Ashton Vale ('Longmoor Village'):
 - ETM Contractors (349) pointed out that the related planning permission (ref. 21/03166/P) is subject to judicial review.
 - Esteban Investments Ltd (420) objected to the boundary shown on the Policies Map on the basis that it did not correspond with the related planning permission boundary.
 - The Environment Agency (465) objected on flood risk grounds and due to the allocation being on a former landfill site.

- Re. the proposed housing allocation for land adjacent to Elsbert Drive, Bishopsworth:
 - The Wring Family Trust (383) requested policy wording to specify that the main vehicular access for the wider development area will be taken off the A38 / Bridgwater Road.
 - Taylor Wimpey (347) sought clarification on the council's expectations regarding the cross-boundary development framework or masterplan. They favoured wording which allowed this to be produced informally by themselves as the site landowner and the landowner of the adjoining site in North Somerset, rather than being formally approved by the council.
 - Taylor Wimpey (347) objected to the requirement that development should address the residential amenity of existing Elsbert Drive homes as unnecessary as the issue would be covered by other Local Plan policies.
 - Taylor Wimpey (347) opposed the reference to development according with all relevant local plan policies on the basis of a lack of justification and inconsistency with the approach taken for other allocations.
 - North Somerset Council (188) considered that it would be useful if the exceptional circumstances could be clarified for proposing to release this land from the Green Belt.
 - North Somerset Council (188) also considered that the co-ordinated masterplanning of the allocation site and that adjoining in North Somerset would need to address areas where the policy context within North Somerset and Bristol is different, such as affordable housing provision.
 - Natural England (489) considered that any future planning application should be informed by adequate assessments of impacts on bats and the North Somerset and Mendip Bats Special Area of Conservation.
- A failure to allocate for housing Green Belt land adjoining the dwelling known as Ponderosa, Bridgwater Road was objected to by Chapel Hill Homes (433).

Policy DS12: New neighbourhood – Bath Road, Brislington

Representations received: 26 Object: 24 Support: 2

- Objections to the proposed development allocation were made by Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Jim Mayger (97), Anna Tucker (98), Catherine Withers (153), Hilary Rydon (156), Fran Whitlock (110), Julia Halpenny (113), Sue Chubb (124), Nick Smith (293), John Courtney, June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Thomas Lewis (111), Bridget Bennett (154), Richard Sawyer (165) and Martyn Cordey (359).
- Horizon Homes (412) (owners of part of the area proposed for allocation) considered there was a strong case for increasing the proposed capacity of the site. They also thought the part of the allocation they own could proceed in advance of the remaining part of the site.

- Extending the boundary of the proposed allocation to include land north of the Bath Road was requested by Claverton Healthcare Ltd (206).
- References to the adjacent former landfill site, the flood risk-related requirements development should meet and ensuring development was set back eight metres from Brislington Brook were sought by the Environment Agency (465).
- Setting out the requirements for the minimum quantum of open space / green infrastructure that developments at this location will be expected to deliver was recommended by Natural England (489).
- Regarding the reference in para. 3.3.34 to the potential relocation of the Brislington Park & Ride to land near Hicks Gate Roundabout, Bath and North East Somerset Council (496) noted that this land currently lies in the Green Belt. Such a relocation would therefore be contingent upon exceptional circumstances to justify removal of the land from the Green Belt to support improved transport facilities.

North Bristol

Policy DS13: Lockleaze

Representations received: 2 Object: 2 Support: 0

- The presence of 132kV overhead power lines to the west of the policy area was highlighted by National Grid Electricity Distribution (South West) (84). They thought the policy should include reference to safeguarding the retained power lines and incorporating them sensitively into development proposals.
- Text to ensure development is set back eight metres from the Horfield Brook and directed to Flood Zone 1 where possible was sought by the Environment Agency (465).

Policy DS14: Central Southmead

Representations received (for both Policy DS14 and Lawrence Weston): 1

Object: 1 Support: 0

- No main issues identified.

Lawrence Weston

- The Environment Agency (465) were concerned about a lack of reference to flood risk as they thought large areas of Lawrence Weston were in Flood Zones 2 and 3, within which there should be no development unless the sequential test has been met with a suitable flood risk assessment.
- As the area also includes the former Saltmarsh Drive and the University Playing Fields landfill sites, the Agency also advised that investigations would be needed into the presence of landfill gas and ground stability before any development takes place.

Infrastructure, Developer Contributions and Social Value

Policy IDC1: Development contributions and CIL

Representations received: 17 Object: 15 Support: 2

- Including within the policy text references to the legislative tests that relate to the use of planning obligations was sought by Dandara Living Developments Ltd (430), Gloucestershire County Cricket Club (447), Sovereign Network Group (461), AEW UK Real Estate Investment, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482).
- In connection with the development contributions to be sought by this policy, concerns about the Local Plan Viability Assessment evidence base document were raised by the Home Builders Federation (414), Dandara Living Developments Ltd (430) and NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468).
- Clarification on the policy's reference to 'geographically or functionally' and whether this referred to on-site or off-site mitigation was sought by Dandara Living Developments Ltd (430).
- A failure of the policy to refer to how viability review or viability testing can be used to support planning applications was objected to by Frank Bruce and Company Limited (493).
- Concerns were raised by Hotwells and Cliftonwood Community Association (261) on the amount of financial contributions that would be received from development proposals in Western Harbour and whether they would be spent on needs agreed by the local community.
- A lack of clarity on what contributions would be sought was of concern to Dominic Hogg (448) and Dandara Living Developments Ltd (430), who considered reference to the Planning Obligations SPD was inappropriate given it was published in 2012.
- Reference to the Bristol Avon Flood Strategy and its related policy (Policy FR2) was sought by the Environment Agency (465).
- Reference to heritage asset improvements was suggested by Historic England (476).
- The expectation that new development should contribute to the management of existing greenspaces and to the enhancement of the green infrastructure network was expressed by Natural England (489).

Policy SV1: Social value and inclusion

Representations received: 14 Object: 12 Support: 2

- Concern that this policy was inconsistent with national planning policy was raised by McCarthy Stone (300) and Elizabeth Blackwell Properties Ltd (189).

- A perceived lack of clarity in the policy was objected to by Elizabeth Blackwell Properties Ltd (189), Dandara Living Developments Ltd (430), Dominic Hogg (448), Orangestar Capital (Globe Bristol) Ltd (441), Argo Real Estate Management Ltd (491) and Fusion Group (396).
- Insufficient evidence to justify the policy was of concern to Elizabeth Blackwell Properties Ltd (189).
- Objection on the grounds that the policy was overly onerous was made by the Home Builders Federation (414) and Elizabeth Blackwell Properties Ltd (189).
- Concern about how the implementation of the policy would be monitored was raised by Orangestar Capital (Globe Bristol) Ltd (441), Argo Real Estate Management Ltd (491) and Yara Capital (426).
- Strengthening the policy to ‘require’ development proposals to be accompanied by social value strategies rather than ‘be expected to’ was advocated by Bristol Business Improvement Districts (423).
- Specific reference in the policy to development proposals which affect the ‘24 Hour economy ecosystem’ was sought by NightWatch (368).

Urban Living: Making the best use of the city’s land

Policy UL1: Effective and efficient use of land

Representations received: 29 Object: 19 Support: 10

- Concern that the policy was not in accordance with the ‘Achieving appropriate densities’ section of the National Planning Policy Framework (December 2023) was raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478).
- Removal of references to the Urban Living Supplementary Planning Document was sought by some representors:
 - Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478) considered it dated, inconsistent with national planning policy, not tested for its impact on development viability and not subject to independent examination. They also considered the document underpinned requirements in the policy and thought this inappropriate.
 - Dandara Living Developments Ltd (430) questioned whether it was fit for purpose for supporting the policy’s implementation.
 - Dominic Hogg (448) considered it to be a design code which was not compliant with national planning policy.

- A lack of clarity in the policy wording was raised by Dandara Living Developments Ltd (430), CPRE Avon and Bristol (492), Dominic Hogg (448) and ElhPlan (404), e.g. ‘under-used land’ and ‘optimum’.
- While supportive in principle of the approach to utilise previously developed land, Redrow Homes Ltd (369) thought that additional greenfield sites should be allocated for housing, particularly to assist in delivering more affordable homes.
- The absence of evidence to justify the policy was of concern to Dominic Hogg (448), who objected to it not being informed by a local design code.
- ‘Locations for more intensive forms of development’ section of policy text:
 - A more fine-grained approach was sought by Elizabeth Blackwell Properties Ltd (189) in order to maximise opportunities for delivering housing.
 - Giving more prominence in the policy text to the growth and regeneration areas in the Development Strategy policies was advocated by Elizabeth Blackwell Properties Ltd (189) and Central Fishponds Ltd (405).
- Diagram 5.1 showing indicative areas for the density of new development generated the following issues:
 - Showing Hotwells and Cliftonwood on the diagram as an Inner Urban Area rather than part of the city centre was sought by Hotwells and Cliftonwood Community Association (261).
 - Showing Western Harbourside as an Outer Urban Area rather than part of the city centre was advocated by Michael Tanner (281).
 - Showing the areas of growth and regeneration set out in the Development Strategy was recommended by Central Fishponds Ltd (405).
 - Its usefulness was questioned by Frank Bruce and Company Limited (493), Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478). Concerns expressed included fears that guidance on locations where certain densities will be appropriate was contrary to the concept of densities being optimised based on site and location specific considerations.
 - Excluding parts of Shirehampton from areas shown as Outer Urban Area (More Intensive) was sought by John Knight (126) who was concerned about potential impacts on important open space and conservation considerations.
 - With reference to Fishponds being shown as Outer Urban Area (More Intensive), Fishponds Community Planning Group (190) thought it would not be realistic to support intensive development without an assessment of the transport needs of the area, and the area’s inclusion within the city’s strategic transport plan.

- The need for the diagram to take account of neighbouring authorities' centres and major public transport routes/corridors was raised by Elizabeth Blackwell Properties Ltd (189).
- Showing the boundaries of the Development Strategy policy areas (Policies DS1-14) on the diagram was requested by Central Fishponds Ltd (405).
- A failure of the policy to test alternative density strategies to deliver an increased quantum of new homes was objected to by Dandara Living Developments Ltd (430).
- Additional reference to considerations which might affect the delivery of high density development, e.g. on-site green infrastructure provision relating to biodiversity net gain requirements, was sought by the Home Builders Federation (414).
- Natural England (489) were keen to emphasise the following:
 - as brownfield land can hold significant ecological value, ecological surveys must inform development proposals on such land.
 - as higher development densities could reduce access to private greenspace it will be important that policy for new development seeks to provide new greenspace, enhance existing greenspace and its accessibility or consider other measures like urban greening.
- David Gray (303) sought the addition of text to ensure the policy supported increased commuting on foot, bicycle and public transport in areas of imbalance between resident workers and jobs.
- Change Real Estate and Abri (425) considered the policy to be unsound because it felt the boundary of the Bristol Temple Quarter Policy (Policy DS2) had not been drawn correctly. By excluding existing site allocations such as Land at Bath Road, west of Totterdown Bridge, it felt that Policy UL1 'Effective and efficient use of land' would not be effective in delivering the optimum density of development.
- Specifying Lawrence Hill as a location where City Centre-type densities may be appropriate was suggested by Frank Bruce and Company Limited (493).
- Support for the policy was received from Abri (163), Argo Real Estate Management Ltd (491), Fusion Group (396), Gloucestershire County Cricket Club (447), Orangestar Capital (Globe Bristol) Ltd (441), Structadene (455) and Yara Capital (426).

Policy UL2: Residential densities

Representations received: 18 Object: 15 Support: 3

- Concerns that the policy could lead to a predominance of multi-storey apartment buildings at the expense of meeting the full range of housing needs, types and tenures were raised by the Home Builders Federation (414) and Persimmon Homes Severn Valley (450).

- Fears that the implementation of the policy could prejudice the delivery of other important planning objectives such as good design, open space and biodiversity net gain requirements were cited by the Home Builders Federation (414) and Persimmon Homes Severn Valley (450).
- Providing greater flexibility by allowing site specific matters to be considered when assessing appropriate density was sought by the Home Builders Federation (414).
- Concern that the policy was not in accordance with the 'Achieving appropriate densities' section of the National Planning Policy Framework (December 2023) was raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478).
- Objection to the expected minimum densities referred to in the policy was made by Dandara Living Developments Ltd (430) on the grounds they were considered too low. They felt they did not reflect the higher densities that have been achieved by development in recent years, as evidenced in the Bristol Urban Potential Assessment.
- Criticisms that the policy's references to 'suggested minimum' densities were too negatively worded were made by Elizabeth Blackwell Properties Ltd (189) and Gloucestershire County Cricket Club (447). In the context of unmet housing need they felt the approach should be to explore the maximum density possible on a site.
- The suggested minimum densities set out in the table within the policy text provoked several responses:
 - The need to review the density figures was suggested by:
 - Elizabeth Blackwell Properties Ltd (189), who thought it necessary to ensure they were appropriate for different scales of development, particularly smaller infill sites.
 - Persimmon Homes Severn Valley (450), to specifically facilitate the delivery of houses.
 - The need to remove the table was advocated by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478). They felt it was contrary to the approach of densities being based on site- and location-specific considerations, and that the areas referred to in the table were too broad to be useful for decision making purposes.
- Including St Philip's Marsh with Bristol City Centre in the table within the policy text was requested by Conygar Bristol Ltd (403).
- Concerns about potential negative impacts arising from high density development (e.g. on character, heritage, traffic and transport) in certain locations were raised by two representors:

- in the Western Harbour area (representation by Helena Hobbs (116));
- in Fishponds (representation by Fishponds Community Planning Group (190)).
- ElhPlan (404) felt the policy would worsen inequality as they considered highest densities were being promoted in areas of highest deprivation. They thought higher densities should be located in non-deprived areas where available services and land uses could support such development.

Housing

Policy H1: Delivery of new homes

Representations received: 85 Object: 66 Support: 19

- Method used to calculate housing requirement:
 - A failure to demonstrate in the policy or evidence base the exceptional circumstances for deviating from the standard method of calculating the housing requirement was objected to by representors from the housing development industry / landowners. They felt the full standard method figure should be used, while the Home Builders Federation (414) considered the aim should be to achieve higher than the standard method figure.
 - Choosing to depart from the standard method received support from CPRE Avon and Bristol (492) and a number of individual members of the public.
- Housing requirement figure:
 - Considered too low by representors from the housing development industry / landowners. They promoted instead higher levels of housing, for reasons including delivering more affordable homes. Conygar Bristol Ltd (403) and Central Fishponds Ltd (405) thought that a housing requirement below housing need may result in under-investment in infrastructure by service providers.
 - A lack of clarity in the policy concerning the overall housing requirement figure and consequent amount of unmet need was raised by Crest Nicholson Partnerships and Strategic Land (278), Gladman Developments (388), Dandara Living Developments Ltd (430) and National Highways (473).
 - Sustainability appraisal:
 - A perceived failure of the sustainability appraisal to assess reasonable alternatives that could support a higher housing requirement was objected to by Waddeton Park Ltd (406), Black Box Planning (428), Taylor Wimpey and Vistry Homes (488).
 - Evidence to justify requirement:

- References in the evidence base to past delivery rates were considered flawed by the Home Builders Federation (414) and Redrow Homes Ltd (369). They felt they entrenched previous under-delivery in estimates of future potential.
 - Concerns about the capacity calculations informing the housing requirement were raised by representors from the housing development industry / landowners. These included:
 - insufficient detail, e.g. absence of a Strategic Housing Land Availability Assessment and Five Year Housing Land Supply position statement;
 - flawed calculations due to:
 - Insufficient sites allocated or insufficient reasoning given for non-allocation of previously promoted sites;
 - Density assumptions for development allocations and urban potential sites set too low;
 - Insufficient capacity assumed for growth and regeneration areas;
 - Not pursuing development allocations proposed at previous Local Plan consultation stages.
 - Concern that growth in student numbers had not informed housing need and / or was not accurately represented in the Local Housing Needs Assessment was raised by representors from the housing development industry and the two local universities.
 - National Highways (473) considered that the transport evidence would need to reflect the scale of unmet housing need in neighbouring authorities, particularly relating to any impacts on the strategic road network.
- Delivery of requirement:
 - Doubts about realistic delivery of significant elements of the identified capacity were raised by the Home Builders Federation (414) and Waddeton Park Ltd (406), citing the growth and regeneration areas, urban potential sites and small windfall sites in particular.
 - CPRE Avon and Bristol (492) were not convinced of the requirement's deliverability overall and expressed concern about future encroachment on the Green Belt within and beyond Bristol. Similarly, Kevin Chidgey (345) felt the housing requirement and capacity estimates were ambitious and may exceed what is deliverable.
- Omissions from policy:

- Policy should also cover:
 - affordable housing (representation by Abri Homes Ltd (163))
 - older people's housing (representation by Anchor (346))
 - the need for different house types (representation by Taylor Wimpey (347), AEW UK Real Estate Investment Trust and Sovereign Network Group (461))
- Allocating more small sites to support small developers was advocated by the Home Builders Federation (414).
- Green Belt review:
 - The need for the council to undertake a comprehensive Green Belt review to identify further housing capacity including potential cross-boundary development opportunities was urged by Copperfield (386), Gladman Developments (388), Waddeton Park Ltd (406), Redrow Homes Ltd (369) and LiveWest (245).
- Unmet housing need and the duty to cooperate:
 - Representors from the housing development industry / landowners noted that an unmet need had been identified irrespective of how the requirement had been calculated. Some considered that the council had failed in its duty to cooperate with neighbouring authorities on how Bristol's unmet would be accommodated by them. The absence of a statement of common ground which detailed an agreed approach to meeting the unmet need was noted in this regard.
 - Concerns that the displacement of unmet need to adjoining authorities would have an unreasonable impact on surrounding areas were raised by representations from ten individual members of the public.
 - South Gloucestershire (469) and Bath and North East Somerset Councils (496) concurred with the approach set out in para. 6.8 that the extent to which any of Bristol's unmet housing need could be met by neighbouring councils would be explored through the preparation of their respective local plans.
 - North Somerset Council (188) noted that they were not able to accommodate any of Bristol's unmet need.
- Gladman Developments (388) and Redrow Homes Ltd (369) doubted that the plan would be adopted by 2025 and considered that the plan period should be extended to 2041 or later to ensure at least a fifteen year plan period.
- Maximising housing capacity in the growth and regeneration areas was promoted by developers with a land interest in a number of these locations.
- The following sites were suggested as suitable for housing and were promoted as development allocations: Woodgrove Road, Henbury; Queens Parade, city centre; Elm Tree Farm, Stapleton; Land at Golden Hill; the County Ground,

Bishopston; Netham Road, St. George; and the previously allocated site at Brislington Meadows.

- Concerns about the future impact on the city of higher housing densities and more tall buildings were raised by CPRE Avon and Bristol (492), Knowle Neighbourhood Planning Group (372), Waddeton Park Ltd (406) and Kevin Chidgey (345).

Policy AH1: Affordable housing provision

Representations received: 41 Object: 39 Support: 2

- 35% affordable housing requirement:
 - Objection to a lack of flexibility to allow variation in provision on a site by site basis was raised Abrdn Plc (440);
 - Excluding city centre development from the policy was sought by Legal and General (409);
 - A city-wide requirement was inconsistent with the area-based percentages approach set out in the Local Plan Viability Assessment according to the Home Builders Federation (414). Bristol Alliance Limited Partnership (442) also considered that the affordable housing percentages should reflect viability variations across the city;
 - Concerns over the requirement for proposals to be designed at the application stage to deliver 35% affordable housing were raised by Dandara Living Developments Ltd (430);
 - A lack of clarity in the policy approach was objected to by Dandara Living Developments Ltd (430). They thought the requirement for 35% affordable housing should be stated followed by the expectation that development delivers the affordable housing percentages without public subsidy set out for the different areas but, where this is below 35%, to work with the council to deliver the shortfall through other mechanisms. Dominic Hogg (448) also considered that the affordable housing percentages sought without public subsidy should be set out in the main policy text rather than the explanatory text.
- Viability issues:
 - Concerns were raised by McCarthy Stone (300) that certain forms of older people's housing had not been fully viability tested, including retirement living and sheltered housing, to determine the appropriate levels of affordable housing contribution from these forms of development;
 - The Local Plan Viability Assessment did not fully consider the wide range of challenges and additional costs currently faced by developers according to the Home Builders Federation (414);
 - Specific reference to the likelihood that viability issues will be an issue for a number of the growth and regeneration areas such as Lawrence Hill was sought by Frank Bruce and Company Limited (493);

- The application of Local Housing allowance levels to cap all rented affordable housing tenures (set out in para. 6.34) could affect the viability of residential developments for older people according to Anchor (346).
- Threshold approach:
 - Objection to the threshold approach being applied to the city centre only was made by Frank Bruce and Company Limited (493). They thought it should apply to Lawrence Hill and other central Bristol growth and regeneration areas;
 - Consideration to the expansion of the threshold approach to the city as a whole was advocated by Sovereign Network Group (461) and AEW Real Estate Investment Trust (435);
 - The threshold approach should continue to be applied to the areas as currently set out in the Affordable Housing Practice Note according to Orangestar Capital (Globe Bristol) Ltd (441);
 - McCarthy Stone (300) sought further detail within the policy on the threshold approach.
- Proposed affordable housing tenure proportion:
 - Concerns were raised by Windmill Hill and Malago Planning Group (174), Friends of Novers Hill and Crox Bottom (Western Slopes) (155) and 14 other individual respondents over the identified preference for 75% social rent affordable housing instead of retaining the proportion of 77% sought in the existing local plan. They felt retaining this percentage would ensure a greater quantity of affordable housing delivered would meet the needs of people on lower incomes.
 - Abri (163) considered that greater policy flexibility could be achieved if the identified preference for 75% social rent affordable housing could be expressed as 75% affordable homes for rent. South West Housing Association Planning Consortium (439) also expressed concern that the tenure mix sought did not include affordable rent and AEW Real Estate Investment Trust (435) considered that tenure requirements could be more flexible. The Home Builders Federation (414) also sought some flexibility in the tenure requirements to improve viability.
 - Objections were raised by Anchor (346) over the preferred tenure split of 75% social rent affordable housing and 25% affordable home ownership. Instead, the tenure should be negotiated on a site by site basis.
- References to the Affordable Housing Practice Note:
 - Clarification on whether the existing Practice Note or a replacement document would be used to provide guidance on the implementation of the policy was sought by Sovereign Network Group (461) and AEW Real Estate Investment Trust (435);

- Removal of reference to the Practice Note from the main policy text and relocation to the explanatory text was advocated by Legal and General (409).
- The reference in para. 6.24 to changes to affordable housing percentages made during the plan period being made through an updated version of the Practice Note was objected to by Dandara Living Developments Ltd (430).
- Further detail within the policy on the affordable housing review mechanisms was sought by McCarthy Stone (300).
- Concerns were raised by Sovereign Network Group (461) and AEW Real Estate Investment Trust (435) over the effectiveness of the shortfall mechanism relating to the seeking of funds for additional affordable housing (identified in para. 6.25, bullet point 3) if Homes England had not confirmed to Bristol City Council that such funding would be available.
- The flexible tenure approach to delivering affordable home ownership (either First Homes or shared ownership units) was supported by Sovereign Network Group (461) and South West Housing Association Planning Consortium (439). However, Dandara Living Developments Ltd (430) queried whether the approach was consistent with national policy.

Policy H2: Preventing the loss of residential accommodation

Representations received: 1 Object: 1 Support: 0

- Elizabeth Blackwell Properties Ltd (189) raised no objection to the policy but suggested that replacement homes could be in the form of non-C3 accommodation such as student accommodation or Houses in Multiple Occupation.

Policy H4: Housing type and mix

Representations received: 11 Object: 9 Support: 2

- The requirement to redress any harmful housing imbalance that exists in an area was objected to by Elizabeth Blackwell Properties Ltd (189). They felt this should not be used as a tool to restrict higher density development. Dandara Living Developments Ltd (430) also objected. They considered development should address identified housing needs rather than address historic issues.
- Persimmon Homes Severn Valley (450) considered that the first criterion of the policy text should be re-worded to support the delivery of more houses which reflected evidence in the Local Housing Needs Assessment.
- Amendment to the policy text to clarify that housing mix requirements will be subject to viability testing was sought by AEW UK Investment Management (458).

Policy H5: Self-build and community-led housing

Representations received: 18 Object: 18 Support: 0

- Provision of self-build / custom housebuilding and / or community-led housing:
 - Objection to the 5% requirement on allocated sites and a proportion within growth and regeneration areas was made by Taylor Wimpey (347), the Home Builders Federation (414) and Dandara Living Developments Ltd (430). Concerns cited were the ability to optimise densities on sites with this form of housing present, practical construction considerations, viability and a lack of clarity over implementation.
 - Taylor Wimpey (347) raised particular objection to the Elsbert Drive site allocation being identified for this form of development which is under the control of the respondent.
- ‘Community-led housing exception sites’ section of policy text and the list of site types where community-led housing may be permitted:
 - Taylor Wimpey (347) questioned the justification for why this particular type of housing would be allowed on Industry and Distribution Areas and not other housing;
 - WeCanMake (446) requested an additional site type be added to the list. They sought reference to the sub-division of large residential plots in low density areas where there is no harmful impact to the character and appearance of an area or to the amenity of existing development.
 - Objection to the inclusion of the ‘Reserved Open Space’ site type was made by Bristol Parks Forum (495) and Dominic Hogg (448).
- The proposed allocation of land at College Road, Fishponds for self-build, custom housebuilding or community-led housing was of concern to Fishponds Community Planning Group (190).

Policy H6: Houses in multiple occupation and other shared housing

Representations received: 24 Object: 20 Support: 4

- Diana Swain (216), Hampton Park and Cotham Hill Community Group (344), Leslie Cooper (215), Clifton Down Community Association (277), Merche Clark (260), Oakfield Residents Association (275) and Richmond Area Residents Association (370) requested that the full content of the existing ‘Managing the development of houses in multiple occupation’ Supplementary Planning Document (SPD) be brought into the local plan or that the existing SPD is considered alongside this policy in full but with particular regard to the sandwiching assessment (set out in section 4.1 of the SPD).
- The existing local plan policy relating to Houses in Multiple Occupation should be retained according to Elizabeth Blackwell Properties Ltd (189), or greater flexibility provided by Policy H6.
- A lack of reference to / guidance on co-living accommodation was of concern to the Watkin Jones (437) and Dominus Real Estate (289).

Policy H7: Managing the development of purpose-built student accommodation

Representations received: 38 Object: 36 Support: 2

- Student bed space limits:
 - General objection to the limits was made by:
 - Bristol Animal Rescue Centre (252), Conygar Bristol Ltd (403), Elizabeth Blackwell Properties Ltd (189), University of the West of England (408), Fusion Group (396), Watkin Jones (437), Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Christian Grant Properties Ltd (443), Smart Urban Living Bristol (one) Ltd (451), Cubex Land Limited (453), Unite Group Plc (457), Empiric Student Property (459), Schrodgers UK Real Estate Fund (460), University of Bristol (487), CKC Developments Ltd (397), Dominus Real Estate (289) and Argo Real Estate Management Ltd (491), with many requesting their removal.
 - Most expressed concern that limits would not meet the need / make sufficient provision for student accommodation in the city including current undersupply/shortfall and future demand based on forecast growth including University of the West of England (408) (UWE) expansion.
 - Some respondents suggested alternative approaches including the figures being referred to as indicative/minimum requirements or increasing the bed space figures to reflect revised need calculations that take account of existing undersupply and UWE expansion plans.
 - In contrast, Richmond Area Residents Association (370) and Action for Balanced Communities (204) considered the limits were set too high to be effective in preventing harm to communities.
 - Student bed space limit figures identified for particular sites / locations:
 - These were not supported by evidence according to the University of the West of England (408), Abrdn Plc (440), Christian Grant Properties Ltd (443) and Unite Group Plc (457);
 - The University of Bristol (487) were concerned that the figures for the Clifton and Stoke Bishop residential campuses had been under-estimated;
 - AEW UK Investment Management (458) objected to the student bed space limit for Bristol Shopping Quarter and considered it should be market-led and evidenced;
 - Centrica Combined Investment Fund c/o LaSalle Investment Management (429) raised concern that the student bed space limit for Bristol Shopping Quarter was not evidenced;
 - Bristol Animal Rescue Centre (252) considered that the student bed space limit for Bristol Temple Quarter and St. Philip's Marsh was inflexible and Conygar Bristol Ltd (403) considered it too low.

- Dandara Living Developments Ltd (430) objected to the student bed space limit for Frome Gateway and felt it should be increased.
 - Structadene (455) requested that further consideration be given to the bed space limits set out for areas of growth and regeneration with a view to increasing the limits if evidence provided by other respondents on student housing need was compelling.
 - Objection was raised by Richmond Area Residents Association (370), Action for Balanced Communities (204), Andrew Waller (267) and Oakfield Residents Association (275) to the 800 bed space limit for the University of Bristol Precinct. All respondents considered that this level of bed space provision would adversely affect the area. Action for Balanced Communities (204) and Oakfield Residents Association (275) requested a significant reduction in the number (to 100 bed spaces).
- The failure of the policy to make any bed space provision to support the potential expansion of its Bower Ashton Campus was of concern to the University of the West of England (408).
- Calculation / evidence of student bed space need:
 - Concern that the Local Housing Needs Assessment had underestimated student growth was raised by the University of the West of England (408), Abrdn Plc (440) and the Bristol Alliance Limited Partnership (442).
 - The identified need for additional purpose-built student accommodation bed spaces up to 2040 (set out in para. 6.76) and / or the evidence supporting this figure did not take account of the current shortfall / undersupply of bed spaces and UWE expansion plans and would therefore not be sufficient to meet student accommodation needs according to Bristol Animal Rescue Centre (252), Conygar Bristol Ltd (403), Centrica Combined Investment Fund c/o LaSalle Investment Management (429), Elizabeth Blackwell Properties Ltd (189), Dandara Living Developments Ltd (430), Watkin Jones (437), Christian Grant Properties Ltd (443), Smart Urban Living Bristol (one) Ltd (451), Cubex Land Limited (453), Unite Group Plc (457), Empiric Student Property (459), Schrodgers UK Real Estate Fund (460), University of Bristol (487) and CKC Developments Ltd (397).
 - A perceived failure of the policy to meet objectively assessed need for student accommodation in the city was identified by Centrica Combined Investment Fund c/o LaSalle Investment Management (429) and Watkin Jones (437).
- Guideline bed space thresholds (set out at para. 6.87):
 - Objection to the thresholds was made by Gloucestershire County Cricket Club (447), Fusion Group (396), Watkin Jones (437), Christian Grant Properties Ltd (443), Empiric Student Property (459), Schrodgers UK Real

Estate Fund (460), the University of Bristol (487) and Argo Real Estate Management Ltd (491), with many requesting their removal.

- They considered the approach overly restrictive, would limit supply in locations most appropriate for purpose-built student accommodation, would potentially exclude development on sustainably located sites and lacked justification/evidence. One respondent suggested that alternative parameters should be set.
- ‘Purpose-built student accommodation provision - other locations’ section of the policy text and its requirement that such accommodation should form part of mixed use developments:
 - Fusion Group (396) sought flexibility on this requirement;
 - Dandara Living Developments Ltd (430) objected, stating that the local imbalance test would be sufficient to ensure mixed communities;
 - Christian Grant Properties Ltd (443), Empiric Student Property (459), Schrodgers UK Real Estate Fund (460) and the University of Bristol (487) considered the requirement would be impractical or unviable in many cases and may restrict the supply of purpose-built student accommodation. They suggested the policy be re-worded to promote mixed use / compatible residential uses.
- ‘Affordable student housing’ section of policy text:
 - The University of Bristol (487) raised objection, citing concerns around viability impacts and constraint of supply. They sought:
 - removal of the requirement; or
 - replacement with a commitment to work with higher education providers to establish a suitable mechanism to deliver affordable student housing through a supplementary planning document; or
 - if the requirement as set out in the policy was introduced, the approach should align with the 20% ‘fast track’ approach set out in the current Affordable Housing Practice Note.
 - Elizabeth Blackwell Properties Ltd (189), University of the West of England (408), Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Centrica Combined Investment Fund c/o LaSalle Investment Management (429), Dandara Living Developments Ltd (430), Watkin Jones (437), Smart Urban Living Bristol (one) Ltd (451), Unite Group Plc (457) and Dominus Real Estate (289) either objected to the requirement (some respondents also objected to the 35% sought) or expressed concerns:
 - Most respondents considered that the approach was not supported by published evidence of need and/or would make development unviable;
 - Others considered that the approach was not clearly articulated and/or further clarity needed on its implementation.

Ltd (443), Empiric Student Property (459), Schroders UK Real Estate Fund (460) and the University of Bristol (487):

- Some respondents considered that the form and occupation of student housing differed from that of traditional housing within the C3 Use Class, and/or that the requirement had not been viability tested.
 - Christian Grant Properties Ltd (443), Empiric Student Property (459), Schroders UK Real Estate Fund (460) and the University of Bristol (487) suggested that a contribution could be sought should bed spaces be converted to C3 use in the future.
- The reference in para. 6.77 to aligning the start date for counting bed spaces to March 2019 should be amended to the start of the plan period according to Bristol Animal Rescue Centre (252), the University of the West of England (408), Abrdn Plc (440) and Bristol Alliance Limited Partnership (442). Conygar Bristol Ltd (403) and Unite Group Plc (457) raised concerns that the total level of bed space supply identified through the bed space limits would already have been granted planning permission if the March 2019 start date is retained.
 - The reference in para. 6.86 to the potential detrimental effects of purpose-built student accommodation on residential amenity and/or the character of an area was objected to by Unite Group Plc (457) and Watkin Jones (437), citing a lack of evidence of such harm.
 - Concern was expressed by the Home Builders Federation (414) that the level of student bed space provision set out in the policy accounts for a sizeable proportion of the planned housing supply overall. They considered the plan needed to better reflect and acknowledge the interaction between student housing and other housing types.
 - Bringing forward a supplementary planning document to support the policy approach was advocated by Richmond Area Residents Association (370), Action for Balanced Communities (204), Andrew Waller (267) and Oakfield Residents Association (275).
 - The existing local plan approach (Policy DM2) was preferred by Fusion Group (396) and Argo Real Estate Management Ltd (491) as it was considered to provide greater flexibility than proposed Policy H7.
 - Reducing the provision of land for student housing for advocated by ElhPlan (404) and Chandos Neighbourhood Association (385), with the latter representor considering that this should be done in order to meet other development needs. Dominic Hogg (448) raised concern over the impact of future student growth on the city.
 - A more robust policy was needed to bring the levels of purpose-built student accommodation more into line with current student numbers according to Kevin Chidgey (345).

Policy H8: Older people's and other specialist needs housing

Representations received: 9 Object: 6 Support: 3

- The requirement for extra care housing or housing with care to provide 10% affordable housing was objected to by McCarthy Stone (300) and the Home Builders Federation (414). They considered that evidence in the Local Plan Viability Assessment had not been adequately taken into account.
- The policy's provision seeking an affordable housing contribution for age-restricted general market housing, retirement living and sheltered housing proposals was objected to by McCarthy Stone (300) and the Home Builders Federation (414), citing concerns that it had not been viability tested.
- Requiring at least 50% of extra care or housing with care dwellings to be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users was objected to McCarthy Stone (300), citing a lack of supporting evidence.

Policy BTR1: Build to Rent housing

Representations received: 13 Object: 10 Support: 3

- The requirement in the policy text's second sentence for development to be 'in accordance with relevant development strategy policies' was objected to by Dandara Living Developments Ltd (430). They thought it was not generally consistent with the content of the Development Strategy policies (Policies DS1 to DS14) as only one of them (Policy DS3) made reference to build to rent development.
- Reference in the policy text's third sentence to the mix of build to rent homes and other residential uses to be determined in accordance with any guidance set out in relevant future supplementary planning documents, masterplans or spatial frameworks was of concern to representors:
 - Centrica Combined Investment Fund c/o LaSalle Investment Management (429), AEW Real Estate Investment Trust (435) and Watkin Jones (437) considered this would tie the provision of build to rent development to future guidance which would not have development plan status and would not be subject to the same level of scrutiny as a local plan. Watkin Jones (437) considered that such guidance should be in the local plan.
 - Similarly, Dandara Living Developments Ltd (430) thought it was inappropriate to refer to the 'controls' offered by these non-statutory documents. They considered the issue of mix would be addressed by Policy H4 with any further guidance brought forward in a supporting role to the policy rather than as a means of control.
- 'Affordable housing provision' section of policy text:
 - The requirement for 75% social rent and 25% shared ownership where affordable housing is provided as a stand-alone block was objected to by Centrica Combined Investment Fund c/o LaSalle Investment Management

(429), Dandara Living Developments Ltd (430), AEW Real Estate Investment Trust (435) and Watkin Jones (437):

- They considered this approach inconsistent with national policy which expects the normal form of affordable housing provision within build to rent development to be Affordable Private Rent.
- Reference in the policy text to further guidance being provided in the Affordable Housing Practice Note was of concern to the Home Builders Federation (414) and Watkin Jones (437). They considered the practice note's content should be properly included in the local plan and therefore subject to independent examination. The Home Builders Federation (414) considered that the document should only be referred to in the supporting text.
- 'Build to rent – general provisions' section of policy text:
 - Regarding the second criterion and its reference to mechanisms to compensate for the sale or withdrawal of any build to rent home, Watkin Jones (437) thought these mechanisms should be set out in the local plan.
 - Regarding the sixth criterion, the on-site management requirement was objected to by Watkin Jones (437). They considered it was not a planning matter nor necessary to provide in all developments.

Policy H9: Accessible homes

Representations received: 8 Object: 7 Support: 1

- Paul Borthwick considered that the policy should make greater provision for wheelchair user dwellings that are accessible.
- The requirement for 10% of housing in proposals of 10 dwellings or more to be wheelchair accessible or easily adaptable was of concern to representors. Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (347) considered it was not supported by evidence in the Local Housing Needs Assessment.
- The requirement for all dwellings to be accessible and adaptable was objected to by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (347), citing concerns about its evidenced justification.

Policy H10: Planning for traveller sites

Representations received: 2 Object: 2 Support: 0

- John Knight (126) and the Westbury-on-Trym Society (229) considered that the policy should refer to the status of existing locations or identify sites to address issues relating to the permanent parking of caravans and other vehicles which have been adapted for residential use on public roads and land.

Economy

Policy E1: Inclusive economic development

Representations received: 7 Object: 5 Support: 2

- Employment and Skills Plans requirement:
 - Development size threshold:
 - A lack of justification and evidence was raised by Sovereign Network Group (461), Taylor Wimpey, AEW UK Real Estate Investment Trust and CBRE Investment Management (471) in their objection.
 - Considered overly onerous by Kevin Chidgey (345).
 - When Plans would be required:
 - Policy text to clarify whether they would be required as part of a planning application or could be conditioned was sought by Royal London Asset Management (494), Sovereign Network Group (461), Taylor Wimpey, AEW UK Real Estate Investment Trust and CBRE Investment Management (471).
 - Type of applications requiring Plans:
 - Clarification on whether Plans would be required for change of use applications was requested by Royal London Asset Management (494).
 - Doubts regarding the implementation and effectiveness of the Plans were expressed by Kevin Chidgey (345), who favoured an alternative approach of seeking financial contributions from larger scale development to established skills training and work placement programmes.
- Relocating existing employment jobs to accessible locations before they were lost was urged by ElhPlan (404).
- To support the national objective of more sustainable transport, rail industry growth should be part of the local plan according to ElhPlan (404).

Policy E2: Employment development land strategy

Representations received: 16 Object: 10 Support: 6

- Business West and the Bristol Property Agents Association (477) questioned whether the economic needs of Bristol and the sub-region would be met, with concerns including:
 - Insufficient policy protection for existing employment sites against higher land value uses;
 - Inadequate provision of new office and industrial development land to meet demand identified in the evidence base documents;
 - Potential for:

- A spatial imbalance in industrial land provision, with new allocations proposed for Avonmouth rather than other areas of the city;
 - An under-provision of city centre office floor space leading to the loss of future occupiers to competitor cities.
- The delivery of industrial work space through the intensification of development not being viable in current market conditions.
- Concerns were raised by Bristol Civic Society (285) about the loss of business sites and job opportunities to housing development, particularly in central and inner Bristol. They thought housing provision should be as part of balanced communities and not risk the loss of the type of jobs (e.g. in industrial and distribution businesses) which might suit the skills of local people.
- Concerns that the policy did not set out an accurate picture of the net amount of land proposed to be designated for industrial and warehousing uses was expressed by Kevin Chidgey (345). This was in connection with the potential significant loss of this type of land in the Development Strategy policy areas.
- Providing more flexibility in the policy to allow alternative land uses on existing employment sites which were no longer viable or attractive to occupiers was advocated by CBRE Investment Management (471). Similarly, flexibility in the policy to allow alternative uses which support commercial activities was sought by Welding Industries Ltd (427).
- The need for the transport evidence base to take into account the likely impact of any employment land proposals on the Strategic Road Network was advised by National Highways (473).
- The policy needed to be carefully balanced and informed by the market and viability issues according to AEW UK Investment Management (458).
- Identifying nightlife venues and 24 hour economy uses as vital employment land uses was urged by NightWatch (368).
- Allowing residential development on some land proposed for employment development to meet housing need and reduce in-commuting was advocated by David Gray (303).

Policy E3: Location of office development

Representations received: 8 Object: 5 Support: 3

- Specific reference in the policy to supporting proposals for the renewal, intensification and extension of existing offices was sought by CBRE Investment Management and Centrica Combined Investment Fund c/o LaSalle Investment Management (474).
- Clarity on the policy text's reference to 'smaller scale' office development was requested by Welding Industries Ltd (427).

- Reducing the amount of land used for offices was recommended by ElhPlan (404).
- Requiring office developments to be designed and built with an alternative use in mind was advocated by ElhPlan (404).

Policy E4: Avonmouth Industrial Area and Bristol Port

Representations received: 8 Object: 7 Support: 1

- Natural England (489) raised a number of concerns:
 - Regarding the policy's in principle support for renewable energy generation, they considered that sufficient evidence had not been provided to demonstrate that large scale deployment of renewables would be deliverable without harm to the Severn Estuary Special Protection Area / Ramsar / Site of Special Scientific Interest designated wildlife sites.
 - They queried reference in the policy's 'Habitat mitigation - Hallen Marsh' section to development contributing towards habitat mitigation measures. They thought that the Hallen Marsh area was created to mitigate the loss of land resulting from developments allowed under the 1957 ICI planning permission. As new development would not be covered by this permission, any contribution would need to be over and above the mitigation provided for the 1957 permission's developments. They thought the policy should be amended to define what was an appropriate contribution to habitat mitigation.
 - Amendment to the Policies Map was sought to exclude a non-developed area of the Severn Estuary Site of Special Scientific Interest close to the oil basin which could support features associated with the site.
- Given the potential for development to have negative effects upon heritage assets in this location, as identified in the Sustainability Appraisal, Historic England (476) thought the policy could indicate how development should respond to likely heritage impacts.
- Additional text to include 'rail freight interchange' as one of the uses supported by the policy was requested by Network Rail (467). This was in connection with land shown on the Policies Map as 'ASA004', land east of Chittingen Road.
- Strengthening the policy to require Bristol Port to maximise the use of existing previously developed land was sought by North Somerset Council (188).
- More flexibility on the uses supported by the policy was advocated by SevernNet (389), e.g. ancillary office uses and those uses which may be identified in promoting the area's decarbonisation through the Local Industrial Decarbonisation Plan.
- Inadequate cross-boundary coordination regarding the Portbury, Avonmouth and Severnside areas was raised by SevernNet (389) in its objection. They felt that, by focussing on Avonmouth rather than also considering Portbury in North

Somerset and Severnside in South Gloucestershire, opportunities had been missed to provide a more positive strategy for the area as a whole.

- The need for evidence to take into account the likely impact of the proposed employment land allocations on the Strategic Road Network was advised by National Highways (473). If mitigation was found to be needed, they considered policy text would be required to make reference to the delivery of necessary infrastructure.

Policy E5: Industry and Distribution Areas

Representations received: 16 Object: 15 Support: 1

- As part of their representation on the approach to employment land provision, Business West and the Bristol Property Agents Association (477) thought that a review was needed of those areas reserved in the existing local plan for industry and warehousing which were no longer proposed for safeguarding in the new local plan.
- More flexibility in the policy to allow the loss of land / floorspace in Industry and Distribution Areas was sought by representors in their objections:
 - Sovereign Network Group (461), CBRE Investment Management and Taylor Wimpey (480) thought criteria should be added to allow a loss where the proposal would contribute to meeting unmet development needs and where there was no longer demand for the existing use.
 - Watkin Jones (437) and Dominus Real Estate (289) sought an additional criterion to allow loss where it was supported by a neighbourhood development plan.
- Removal of Industrial and Distribution Area designation was sought for the following sites / areas:
 - Bailey of Bristol's site at South Liberty Lane / Brook Gate, Ashton Vale. This representation was from Bailey of Bristol (129) who were seeking a mixed-use development allocation on the site.
 - City Business Park, Kingsland Trading Estate and Premier Business Park, Old Market / St Philip's. This representation was from Old Market Community Association (233) who felt that policy relating to these areas was covered by the Old Market Quarter Neighbourhood Development Plan Policy B5.
- Industry and Distribution Area designation was sought by Mr N. Bracey (452) for land at Lamplighters Marsh, Shirehampton.
- Regarding the policy text's reference to Industry and Distribution Areas being reserved for sui generis uses of a similar nature to industry and distribution, clarification was sought by Sovereign Network Group (461), CBRE Investment Management and Taylor Wimpey (480) on the specific uses being referred to. Welding Industries Ltd (427) thought car / vehicle sales should be specified.

- Regarding the list in the policy text of other uses likely to be acceptable on Industry and Distribution Areas, Welding Industries Ltd (427) sought additional references to gyms and other health uses as well as large-scale uses where other suitable sites / buildings were unavailable.
- A policy commitment to a regular review of land designated as Industry and Distribution Area to assess the merits of continued designation was suggested by Sovereign Network Group (461), CBRE Investment Management and Taylor Wimpey (480).
- The Environment Agency (465) commented that all development should be set back 8 metres from the edge of main rivers, culverts or watercourses. They also stated that flood risk principles of the National Planning Policy Framework should be applied to all development planned in the flood zone.

Policy E6A: New workspace within mixed use development

Representations received: 9 Object: 8 Support: 1

- Removal of the policy was sought by Sovereign Network Group (461) and CBRE Investment Management (471), citing lack of evidenced justification and viability impacts as concerns. They also questioned how sustainable it was to expect employment floorspace to be provided on sites whose unattractiveness to potential occupiers had already been demonstrated by its vacancy or underuse.
- Objection to this policy not being applicable to sites within Industry and Distribution Areas proposed for designation under Policy E5 was made by Old Market Community Association (233). They considered it was contrary to what they were seeking to achieve through the Old Market Quarter Neighbourhood Development Plan.
- Concern that the workspace uses promoted by this policy were too restrictive was raised by Old Market Community Association (233) who thought more flexible uses should be allowed to better achieve mixed-use development.
- Structadene (455) thought it may be desirable for the policy to state that redevelopment could include the introduction of mixed uses including residential or student accommodation, where appropriate. They also thought it might be useful for the policy to promote live-work units for certain redevelopment areas such as St Philip’s Marsh.
- Specific reference in the policy text stating that the policy does not apply to Development Strategy policies DS1-DS4 was sought by Dandara Living Developments Ltd (430).
- Concerns about a lack of clarity were raised:
 - Gloucestershire County Cricket Club (447) thought it should specify that the policy applies to development where business, industry or distribution is the primary use, thereby excluding those sites where it is ancillary to another use.

- Sovereign Network Group (461) and CBRE Investment Management (471) sought a definition of ‘recently’ regarding its use in the first sentence of the policy text which refers to ‘...sites and premises currently or recently used...’

Policy E6: Affordable workspace

Representations received: 17 Object: 16 Support: 1

- A number of issues were raised in objections made by representors from the development industry / landowners:
 - lack of clarity on implementation / operation, including uncertainty on:
 - development size threshold and location to which policy will apply;
 - market rent discount proposed;
 - definition of affordable workspace;
 - practical issues, e.g. the management of a building which contains affordable workspace;
 - deferring of key details to the unpublished Affordable Workspace Supplementary Planning Document;
 - impacts on scheme deliverability due to absence of viability testing;
 - lack of evidenced justification.
- Support was received from Bristol Business Improvement Districts (423) and Science Creates (445), although the latter sought clarity on where and how the policy will be applied. Similarly, while welcoming the policy, Business West and the Bristol Property Agents Association (477) noted that details were not yet provided.

Policy E8: Digital connectivity and inclusion

Representations received: 1 Object: 1 Support: 0

- John Knight (126) thought that the Local Plan should state that all new residential development and new broadband infrastructure to existing residences should be 1 gigabits per second symmetrical and all new and existing businesses should be a minimum of 1 gigabits per second and preferably 10 gigabits per second symmetrical. A glossary of broadband definitions was also advocated.

Centres, shopping and the evening economy

Policy SSE1: Supporting Bristol’s Centres – network and hierarchy

Representations received: 16 Object: 13 Support: 3

- Representations seeking the designation of new centres were made:
 - A centre designation covering the extent of the current local plan’s ‘Aerospace industries, south of Filton Airfield’ Principal Industrial and

Warehousing Area designation was sought by YTL Developments (UK) Ltd (407). They felt this would be consistent with the proposal in the draft South Gloucestershire Local Plan for a new 'local centre' at Brabazon (former Filton Airfield) and would reflect the development associated with the new Arena and related uses currently under construction.

- A town or district centre designation covering Eastgate Retail Park was requested by CPG Bristol Limited (286), with an alternative designation being an extension to Stapleton Road District Centre.
- Designating as a local centre the shops on Lanaway Road, near Oldbury Court was advocated by Fishponds Community Planning Group (190), Friends of the Park (Oldbury Court Estate) (295) and Fiona Gleed (287), with the latter representor also advocating the inclusion of the pub on nearby Gill Avenue as part of the designation.
- Regarding the 'distinctive parts of the city centre' identified in the policy text's 'Centre Network and Hierarchy', Bristol Business Improvement Districts (423) suggested consideration be given to including reference to an additional location at Broad Plain/Temple Quay. They felt this would reflect recent retail and leisure uses on Avon and Oxford Streets, supporting new residential development in this location.
- More flexibility in the policy text on the uses allowed in centres was urged by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482).
- Regarding the 'Active Uses' section of the policy text, amendments were sought by Legal and General (409). They thought the policy needed to balance encouraging the provision of active ground floor uses with the requirement for other building needs such as plant and storage.
- Regarding the 'Residential Uses' section of the policy text:
 - wording which provided more support for residential development in centres and commercial spaces / frontages was sought by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482);
 - a lack of clarity regarding reference to 'underused and vacant space away from commercial frontages' was of concern to Anchor (346) in its objection.
- Regarding the 'Creation of New Centres' section of the policy text:
 - concern was expressed that this process should be considered in consultation with communities. In order to avoid unreasonable burdens on the delivery of new centres, Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (482) thought the

policy should make clear that applicants and developers could lead this process.

- specific reference to Temple Quarter and Temple Island was sought by Legal and General (409). They felt this would reflect the location's accessible and sustainable location for growth.
- Objection to the policy was received from Hotwells and Cliftonwood Community Association (261):
 - the inclusion of Hotwell Road as part of the city centre was contested;
 - a failure to plan for expected new growth associated with the Western Harbour development was identified, including consideration of a new local centre and its appropriate location to serve existing and new communities.
- As he felt it was no longer supported by the Government, John Knight (126) thought deleting reference to the '15-minute city' in the introductory text should be considered.

Policy SSE2: Development in Bristol's centres

Representations received: 8 Object: 8 Support: 0

- Regarding the 'City Centre' section of the policy text, amending the policy text of its second paragraph to cross-refer to Policy DSA1 'Bristol City Centre – Broadmead, Castle Park and the Old City' and the Broadmead growth and regeneration area was sought by Bristol Alliance Limited Partnership (442).
- The 'Residential Development' section of the policy text was considered too restrictive in its approach to allowing residential uses:
 - AEW UK Investment Management (458) felt the policy should contain sufficient flexibility to respond to market conditions and any long-term vacancy of units due to lack of commercial interest.
 - According to Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management (472), the criteria which, if met, would allow residential development in 'wider centre boundaries' should also apply to all centre boundaries and not exclude primary shopping areas.
- NightWatch (368) commented that the policy text does not highlight the West End Gay Village area of Frogmore Street.

Policy SSE3: Supporting Bristol's evening, night-time and culture economy

Representations received: 9 Object: 9 Support: 0

- The policy could lead to the sterilisation of land identified for regeneration, according to Marble Mosaic Co. Ltd (371), who requested text to specify that it would not apply to the area identified under Policy DS2 'Bristol Temple Quarter'.

- Regarding the first sentence of the policy text, specific reference to supporting hotel and other visitor accommodation development was sought by Dominus Real Estate (289).
- While supportive of the centres focus, Dominus Real Estate (289) thought amendments were needed to offer support for hospitality uses in other locations, e.g. where identified by a neighbourhood development plan or where the existing use is longer needed.
- Regarding the third paragraph of the policy text and its reference to new evening and night-time economy uses being neighbourly, Hampton Park and Cotham Hill Community Group (344) thought that, as well as having regard to the character of the centre, respecting the amenity of local residents should be referenced.
- Regarding the reference in the policy text to the loss of cultural venues and night time economy uses:
 - a lack of clarity was of concern to Marble Mosaic Co. Ltd (371) in their objection, who sought:
 - a definition of ‘cultural venues’ and ‘night time economy uses’;
 - detail on what information would be required to demonstrate that a use is no longer viable and that the premises could not accommodate another similar use.
 - The Theatres Trust (45) thought that reference to ‘no longer viable’ should be replaced with ‘no longer required by the community’. They felt the term ‘viability’ could be manipulated through the intentional neglect and vacancy of a facility.
- Regarding the ‘Outside space for hospitality businesses’ section, Bristol Business Improvement Districts (423) felt the policy text could be clearer that it is referring to the highway and parking spaces, rather than just the pavement.
- Objection to the ‘Agent of change’ section in the policy text was made by Marble Mosaic Co. Ltd (371) citing concerns that it duplicated national planning policy.
- NightWatch (368) thought that there should be policy text ensuring the ‘Provision and retention of cultural and 24 Hour economy uses’.
- Concerns about noise impacts arising from the construction and operation of new development were raised by Dominic Hogg (448).

Policy SSE4: Town centre first approach to development

Representations received: 3 Object: 2 Support: 1

- Regarding the third paragraph of the policy text relating to planning applications for ‘main town centre uses’, a potential conflict between the policy and Policy E6A ‘New workspace within mixed use development’ was identified by AEW UK Real Estate Investment Trust, CBRE Investment Management and Centrica Combined Investment Fund c/o LaSalle Investment Management (472). They sought detailed amendments to address this.

- The policy’s explanatory text unnecessarily limits the flexibility of Class E uses according to AEW UK Real Estate Investment Trust, CBRE Investment Management and Centrica Combined Investment Fund c/o LaSalle Investment Management (472).

Policy SSE5: Temporary uses in centres

Representations received: 5 Object: 1 Support: 4

- The policy’s statement that the temporary use of vacant sites for car parking will not be acceptable was objected to by the Westbury-on-Trym Society (229). They felt it lacked justification and considered there could be circumstances where car parking could support the viability of centres.

Policy SSE6: Retaining and enhancing markets

Representations received: 2 Object: 1 Support: 1

- Bristol Business Improvement Districts (423) thought that city centre markets should complement rather than detract from the offerings of city centre businesses and specifically should consider the food and beverage offer of businesses nearby.

Policy SSE7: Provision of public toilets

Representations received: 22 Object: 5 Support: 17

- Policy wording requiring toilets to remain open to the public for the duration of the public use of the building was advocated by Windmill Hill and Malago Planning Group (174), who also sought reference to toilets being designed to be safe, secure and able to be supervised.
- Reference to ‘free’ toilets was questioned by Bristol Business Improvement Districts (423), who suggested ‘low cost’ as an alternative wording to ensure their appropriate management.
- The policy was considered unrealistic and expecting too much of developers by the Westbury-on-Trym Society (229).
- Concerns were raised that the policy lacked clarity on how it would be implemented by AEW UK Investment Management (458), Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Centrica Combined Investment Fund c/o LaSalle Investment Management (475). Clarity was sought on who would have access to the public toilets (e.g. customers only?) and which type of developments the policy related to (e.g. leisure schemes or mixed-use housing-led developments with a retail unit?).
- Objection to the requirement that ‘Changing Places’ toilets should be open 24 hours a day when accessed from areas of public realm was made by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Centrica Combined Investment Fund c/o LaSalle Investment Management (475). This was on the grounds of raising safety, security and maintenance issues.

- Support was received from Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Fishponds Community Planning Group (190) and fourteen members of the public.

Policy SSE8: Public houses

Representations received: 8 Object: 2 Support: 6

- Extending the policy’s provisions to cover venues which meet the Music Venue Trust and CAMRA definitions, nightclubs and all other 24 Hour economy mixed venue types was advocated by NightWatch (368).
- Support was received from Bristol Business Improvement Districts (423), Dr Lesly Huxley (151), Leslie Cooper (215), Conor O’Neill (239) and Tony Lloyd (380).

Biodiversity and Green Infrastructure

Chapter-wide issues

- In the absence of a green and blue infrastructure strategy, Natural England (489) considered the chapter’s approach lacked detail on strategic green infrastructure aims and how development proposals could be designed to contribute to those aims. They feared this could lead to green infrastructure improvements failing to form part of a coherent network to target key issues such as urban heat islands and flood risk. It could also mean inequalities in people’s access to greenspace may not be understood and therefore not appropriately addressed.
- A Green Infrastructure Strategy for Bristol was also sought by Urban Greening Bristol (374) and Bristol Business Improvement Districts (423).

Policy BG1: Green infrastructure and biodiversity in new development

Representations received: 30 Object: 26 Support: 4

- Whilst welcoming elements of the policy, Natural England (489) sought the following amendments to strengthen or clarify it:
 - Specific reference should be made to the design of development being informed by ecological networks.
 - The policy should go beyond retaining and enhancing existing green infrastructure features on site. They thought that, by auditing on- and off-site features through Green Infrastructure Statements, development proposals could show enhanced connections to off-site assets.
 - Minimum numbers per new dwelling of features such as bird boxes and bee bricks should be set.
 - Explanation should be provided on what is meant in the policy’s sixth bullet point by providing appropriately for recreational access.
 - Green Infrastructure Statements should identify where financial contributions are required to deal with the management pressures of new development.

- Detail should be set out on the information that Green Infrastructure Statements should provide regarding the long-term management and maintenance of green infrastructure.
- Further guidance is needed on how developers will demonstrate meeting Natural England's Green Infrastructure Standards, e.g. some standards require the council to set targets which developments have to be designed to meet.
- The higher target score of 0.5 for residential greenfield sites in relation to the Urban Greening Factor should be used.
- In relation to the green infrastructure provision matters set out in the policy's seven bullet points, the wording should ensure these matters 'must' be complied with rather than 'should' be.
- Reference could be made to Natural England's 'Green Infrastructure Planning and Design Guide'.
- Reference to the West of England's Joint Green Infrastructure Strategy in para. 9.1.12 could also specify its strategic projects such as the String of Pearls and Waterspace and include a map so that new development can integrate into them.
- Text within the blue shaded box entitled 'Pollinating insects' should be included within the policy to increase its effectiveness and clarity.
- Objection to the policy was made by Anchor (346) who considered it overly onerous, lacking flexibility and insufficiently justified.
- A perception that new development will be required to provide green roofs and living walls was considered inappropriate by Sovereign Network Group (461) on the grounds that it would require a burdensome management cost and, in the case of green roofs, would not be suitable for tall buildings.
- Concerns about the requirement to meet Urban Greening Factor targets were raised by Abrdn Plc (440), Sovereign Network Group (461), Dandara Living Developments Ltd (430), Bristol Alliance Limited Partnership (442), Gloucestershire County Cricket Club (447), AEW Real Estate Investment Trust and CBRE Investment Management (470). These included a lack of flexibility (e.g. not allowing off-site provision), being unnecessary given other policy requirements such as biodiversity net gain, and a lack of evidence to demonstrate no adverse effects on scheme viability. The Home Builders Federation (414) also thought there was a lack of clarity between these targets and meeting biodiversity net gain requirements.
- The failure of the policy to support the concept of mitigation where loss of biodiversity features was unavoidable was objected to by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470).
- A lack of clarity was of concern to several representors:

- definitions of ‘wider network’ in the policy’s first sentence and ‘important’ in its third bullet point were sought by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470).
 - Bristol Parks Forum (495) sought a definition of ‘biodiversity’.
 - Windmill Hill and Malago Planning Group (174) felt the term ‘green infrastructure’ was imprecise. They also considered the implementation of multifunctional benefits referred to in the policy’s fourth bullet point lacked clarity on which benefits would be most appropriate.
 - Sovereign Network Group (461) felt the reference to artificial grass should specify that it could be acceptable for all-weather playing spaces which utilise synthetic grass.
- More stringent policy wording was sought by Bristol Parks Forum (495), Chandos Neighbourhood Association (385), Dominic Hogg (448) and Manor Woods Valley Group (63), e.g. use ‘required’ rather than ‘expected’ or ‘should’. Similarly, the Environment Agency (465) advocated removing ‘Take all available opportunities’ from the fourth and fifth bullet points.
 - Including reference to how green infrastructure can improve water quality through reduced storm overflows was suggested by the Environment Agency (465).
 - Including a map or diagram within the policy which showed the city’s green infrastructure network was advocated by Urban Greening Bristol (374). Similarly, Bristol Parks Forum (495) thought that ecological networks and wildlife corridors should be shown or their locations described. Likewise, John Knight (126) thought the Nature Recovery Network should be shown on the Policies Map.
 - Specific reference to Natural England’s green infrastructure standards for Urban Nature Recovery, Accessible Greenspace Standards and Urban Tree Canopy Cover was advised by Bristol Business Improvement Districts (423).
 - A greater emphasis on nature-based solutions for sustainable urban drainage, the importance of nature and public health, and linking the Urban Heat Island effect with the Keep Bristol Cool strategy was requested by Bristol Business Improvement Districts (423).
 - Including additional information on the installation of nest boxes for birds was advocated by Bristol Swifts (100), Michael Priaulx (227) and Camilla Barlow (17).
 - A perceived failure of the policy to address how the installation and maintenance of green infrastructure improvements would be monitored was of concern to CPRE Avon and Bristol (492), Windmill Hill and Malago Planning Group (174) and Manor Woods Valley Group (63).
 - The absence of a Nature Recovery Strategy for Bristol was of concern to Bristol Tree Forum (148) and Urban Greening Bristol (374), who thought it could hinder opportunities for delivering green infrastructure improvements.

- The production of guidance for developers in preparing Green Infrastructure Statements was recommended by Bristol Urban Greening (374).

Policy BG2: Nature conservation and recovery

Representations received: 40 Object: 38 Support: 2

- Whilst welcoming elements of the policy, Natural England (489) sought the following amendments to strengthen or clarify it:
 - Rather than ‘connect to or enhance’, the policy’s first sentence should be amended to ‘restore, connect to and enhance the integrity of the Nature Recovery Network...’.
 - The policy must require development to follow the mitigation hierarchy referred to in national planning policy as this requirement does not relate only to the Biodiversity Net Gain process. Where offsite compensation is required, this should contribute to and enhance ecological networks.
 - Regarding the ‘International’ part of the policy’s ‘Designated sites – hierarchy’ section, additional wording was advised to make clear that potential Special Protection Areas and possible Special Areas of Conservation enjoy the same protection as ‘habitats sites’ defined in national planning policy.
 - In the ‘Local’ part of the ‘Designated sites – hierarchy’ section, wording should be added to ensure development which could harm Sites of Nature Conservation Interest makes a contribution to the continued favourable management of the site.
 - The reference in the third paragraph of the policy to ‘development which is in accordance with the local plan’ should be followed by ‘and has been agreed with the Local Authority Ecologist’.
 - Additional text to the policy’s ‘Irreplaceable habitats’ section should make clear that its standing advice should be followed where development affects ancient woodland, ancient trees, or veteran trees.
 - In line with national planning policy the policy should acknowledge that priority habitats should be conserved, restored and enhanced.
 - Reference should be made to the protections given to protected species and the need to protect and recover priority species in line with national planning policy. Reference was also sought to the need for development to follow Natural England’s standing advice where it has potential to affect protected species.
 - The policy should make clear that development which compromises the recovery of priority species should not be permitted. Cross reference should be made to the Local Nature Recovery Strategy which will identify priority species at a local level.
 - Consideration should be given to a policy for protecting and enhancing soils in line with national planning policy.

- Concern that the policy was inconsistent with national planning policy in connection with its fourth paragraph which deals with proposals resulting in significant harm to biodiversity was raised by Knowle West Regeneration Residents Planning Group / Knowle West Future (373), who suggested alternative wording.
- Objection to the part of the policy relating to harm to identified habitats, species and features of importance (second numbered bullet point of the second paragraph) was made by AEW Real Estate Investment Trust (435), CBRE Investment Management (471) and Sovereign Network Group (461). They felt it should allow development in those circumstances where proposals could mitigate harm.
- The part of the policy relating to mitigation being provided where loss is unavoidable (third paragraph) was objected to by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470). They considered it unnecessary as would be addressed by the biodiversity net gain requirement.
- Expanding the fourth paragraph of the policy was advocated by Bristol Parks Forum (495) to fully cover the process involved in reaching the decision as to whether mitigation is acceptable or not. They also felt that more clarity was needed on the reference to ‘significant harm’. They queried whether this assessment of harm would be before or after mitigation has been considered.
- Various issues were raised on the policy’s ‘Designated sites – hierarchy’ section:
 - ‘National’ sub-section
 - A concern that this section was inconsistent with text in the relevant section of the National Planning Policy Framework was raised by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470)..
 - ‘Local’ sub-section
 - Removal of the word ‘significantly’ ahead of the reference to ‘harmful impact on local wildlife and geological sites’ was sought by Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Windmill Hill and Malago Planning Group (174) and around twenty members of the public. A clearer definition of harm was requested.
 - Bristol Tree Forum (148) regarded the reference to ‘significantly harmful impact’ as lacking clarity.
 - Anchor (346) and Sovereign Network Group (461) considered this section should reflect national planning policy which allows development where harm can be mitigated or compensated for.
 - Redrow Homes Ltd (369) thought the wording too restrictive in relation Sites of Nature Conservation Interest. They felt the focus

should be on assessing whether there would be significant harm to the features for which these sites were designated.

- More stringent policy wording was sought by Dr. Antonia Layard (421) and Manor Woods Valley Group (63), e.g. replace 'will be expected' with 'will be required'.
- The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).
- The Home Builders Federation (414) were concerned that the policy's references to biodiversity and mitigation were confusing the separate biodiversity gain mitigation hierarchy with the mitigation hierarchy for protected species and habitats.
- A failure to reflect the wildlife importance of the Floating Harbour as a nature corridor was of concern to Bristol Business Improvement Districts (423).
- A concern that the policy wording lacked clarity was raised by Dominic Hogg (448) and Dr. Antonia Layard (421).
- Objection to the following sites / areas being designated as Sites of Nature Conservation Interest was made:
 - gardens in Sidford Road, Bedminster / Knowle West (representation by Northern Slopes Initiative (158))
 - Brislington Meadows, land at Broom Hill (representation by Homes England (231))
- Objection to the failure to designate the following sites / areas as Sites of Nature Conservation Interest was made:
 - the wedge of Local Green Space between the two sets of steps between Kingswear Road and Sidford Road (representation by Northern Slopes Initiative (158))
 - land north of the River Trym in the section of Trym Valley Open Space East of Trowbridge Road (representation by Geoffrey Poole (60))
 - area of land to the west of Haldon Close, which includes the bases of former prefabs, at the back of houses on Lynton Road and below the Novers (representation by Northern Slopes Initiative (158))

Policy BG3: Achieving biodiversity gains

Representations received: 23 Object: 21 Support: 2

- Concern that the policy was not consistent with recently published Government policy, regulations or guidance on biodiversity net gain was raised by Anchor (346), Dandara Living Developments Ltd (430), Bristol Tree Forum (148), the Home Builders Federation (414) and McCarthy Stone (300).
- Re. the policy's provision that a minimum of 10% biodiversity net gain should be achieved by development proposals:

- A higher percentage target was sought by Bristol Tree Forum (148), Dominic Hogg (448), Natural England (489) (who advised exploration of a higher requirement, e.g. 20%) and Bristol Parks Forum (495), who suggested 15% for sites adjacent to designated wildlife or open space sites.
- the Home Builders Federation (414) considered the policy should require no more than 10%. They felt that a policy which sought over 10% would need to consider site viability, which they thought had not been covered by the Local Plan's Viability Assessment. They were also concerned that the Viability Assessment's consideration of the impacts of a 10% net gain policy was based on out-of-date build costs.
- The requirement for applications to be accompanied by Biodiversity Gain Plans was opposed by Anchor (346), Sovereign Network Group (461), AEW Real Estate Investment Trust (435) and CBRE Investment Management (471). They felt legislation allowed these to be approved after the granting of planning permission.
- Requiring maintenance of habitat creation and enhancement for at least 30 years was objected to by Dominic Hogg (448) who sought a more relevant period, although did not specify one.
- Amending the policy to make clear that mitigation or compensation for protected species or sites can count towards biodiversity net gain was sought by Anchor (346).
- Removal of the reference to biodiversity credits was sought by Sovereign Network Group (461), AEW Real Estate Investment Trust and CBRE Investment Management (470). They thought the need for credits will only be established through the planning application process so could not be included in a Biodiversity Gain Plan submitted with the application as indicated in the policy (third paragraph, third bullet point).
- A potential for confusion between the biodiversity gain mitigation hierarchy referred to in the policy and the separate mitigation hierarchy for protected habitats and species was identified by the Home Builders Federation (414).
- Natural England (489) welcomed that the policy recognises that biodiversity net gain is additional to mitigation for designated sites and that impacts to irreplaceable habitat cannot be mitigated through biodiversity net gain.
- Amending the policy's wording in its seventh paragraph was sought by Natural England (489). They thought 'where possible' should be removed from the part of the sentence relating to avoiding harm to designated features. This was on the grounds that protection given to designated habitats and species takes precedence over the delivery of biodiversity net gain, which should not harm designated / protected habitats and species.
- Objection to the provision that off-site biodiversity gains should be provided close to the development site was made by Anchor (346) who thought they could

be provided anywhere in England. Conversely, Dominic Hogg (448) considered they must take place within the council's administrative boundary.

- The need for more detail about the Local Nature Recovery Strategy and the interaction between it and the Local Plan was recommended by the Home Builders Federation (414).
- References to the small sites metric and statutory credits were recommended by the Home Builders Federation (414).
- A perceived failure to address how the delivery of biodiversity net gain will be measured and monitored was identified by Bristol Tree Forum (148).
- Greater detail with targets for the implementation and review of this policy were sought by Bristol Conservation Advisory Panel (340).
- The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).
- Concern that the policy did not adequately promote or facilitate offsite biodiversity mitigation opportunities within the council's area was raised by Bristol Tree Forum (148).
- More precise and stringent wording was recommended by Manor Woods Valley Group (63), e.g. replace 'as close as feasible' with 'adjacent' and 'where possible' with 'must'.
- Bringing forward more quickly the Green Infrastructure Strategy for Bristol was regarded by Bristol Urban Greening (374) as important in capturing local biodiversity enhancement opportunities.
- The importance of enhancing / creating features to encourage wildlife occupation of new and existing urban developments was raised by the RSPB (144).

Policy BG4: Trees

Representations received: 18 Object: 15 Support: 3

- Amending the policy to make reference to improving tree canopy cover and increasing tree equity across the city was sought by Natural England (489). This was in relation to its Green Infrastructure Standard S5: Urban Tree Canopy Cover Standard.
- 'Provision of trees' section:
 - The reference to ensuring tree lined streets was objected to by CBRE Investment Management (471) and Sovereign Network Group (461) who thought feasibility and viability considerations should be added.
 - Natural England (489) sought the addition of the word 'all' ahead of the reference to 'practicable opportunities' in the second paragraph.
- 'Protection and replacement of trees' section:

- Text requiring the retention of important trees received contrasting views:
 - More flexibility to allow loss in certain circumstances was sought by Anchor (346), CBRE Investment Management (471) and Sovereign Network Group (461)
 - Strengthening the policy was advocated by Natural England (489) and Dominic Hogg (448), e.g. by removing reference to ‘important’ trees so that all trees were retained.
- The provision relating to ancient woodland and ancient and veteran trees was objected to by Anchor (346), CBRE Investment Management (471) and Sovereign Network Group (461) who felt it was inconsistent with national planning policy regarding the circumstances where development could be allowed.
- Re. the text that replacement trees should be located as close as possible to the development site, reference to new trees being targeted to areas of low existing tree cover was suggested by Natural England (489).
- A lack of definition of ‘important trees’ was criticised by Anchor (346) and Dominic Hogg (448), with the latter favouring reference to trees that have been in their location for more than 25 years.
- Following the text which refers to ‘tree loss or damage is essential to allow for appropriate development’, Natural England (489) thought additional wording should be added to state: ‘...and has been agreed with the Local Authority Arboriculturist’.
- Objection to the tree replacement compensation approach and standard was made by Anchor (346), Clifton College (419) and Sovereign Network Group (461):
 - A more flexible and pragmatic approach was advocated by Clifton College (419) who made detailed policy text suggestions;
 - A concern that the proposed standard lacked sufficient evidence was raised by Anchor (346), CBRE Investment Management (471) and Sovereign Network Group (461), with the former representing the view that replacement of trees at a rate greater than 1:1 should only be required where practical and appropriate;
 - Reference in the explanatory text (para. 9.1.39) to the Planning Obligations Supplementary Planning Document (SPD) relating to replacement trees was of concern to CBRE Investment Management (471) and Sovereign Network Group (461) on the grounds that the SPD did not contain the latest proposed standard.
- Amending the policy to allow for a financial contribution to be made where the replacement tree planting cannot be achieved on site was sought by Anchor (346) to assist with development viability.

- Stipulations on new replacement trees were sought by John Knight (126): that they should be native species grown in the UK, planted at distances between trees to accommodate mature canopies and include long-term maintenance.
- Reference in the explanatory text (para. 9.1.38) to existing tree cover being deliberately reduced prior to a planning application being submitted was objected to by CBRE Investment Management (471) and Sovereign Network Group (461). They felt there was a lack of clarity on:
 - what evidence would be used to determine whether tree cover had been deliberately reduced; and
 - what timeframe would be applied for assessing the period prior to the application being submitted.
- Concerns that the policy was unclear on how it relates to Policy BG3 'Achieving biodiversity gains' was raised by the Home Builders Federation (414). Similarly, Bristol Tree Forum (148) thought the policy did not align with new biodiversity net gain obligations.
- A lack of clarity on how the policy's impact on development viability had been assessed was cited by the Home Builders Federation (414) in its objection.
- Reference to Right Tree Right Place was advised by Natural England (489).
- Text referring to the Forest of Avon Plan and requiring new development to support delivery of it was recommended by Natural England (489).
- More stringent and precise wording was recommended by Manor Woods Valley Group (63) and Bristol Tree Forum (148), e.g. replace 'where possible' and 'should' with 'must' and define 'located as close as possible to'.
- Reference to veteran trees and areas of ancient woodland being identified on an interactive Policies Map was sought by the Westbury-on-Trym Society (229).
- LiveWest (245) requested additional guidance in the policy on street trees, e.g. their installation, while Natural England (489) recommended reference to British Standard BS 8545 in this regard.
- Including wording referring to retrofitting city centre streets with tree planting was sought by Bristol Urban Greening (374).
- Reference to a schedule of suitable street tree species was advocated by Bristol Urban Greening (374).
- Providing detail on agreed tree pit construction was recommended by Bristol Urban Greening (374).
- Reference to Natural England's Green Infrastructure Standard for Tree Canopies was advised by Bristol Business Improvement Districts (423).
- Text to identify the link between trees, climate mitigation and health was requested by Bristol Business Improvement Districts (423), e.g. the type and location of trees to be informed by Keep Bristol Cool urban heat mapping.

- Emphasising the importance of a long-term maintenance strategy for trees was urged by Bristol Business Improvement Districts (423).
- Locating trees in carriageways rather than on pavements where possible was sought by Bristol Business Improvement Districts (423).

Policy BG5: Biodiversity and access to Bristol’s waterways

Representations received: 12 Object: 10 Support: 2

- Support was received from Natural England (489) and Bristol Urban Greening (374).
- References to how water quality will be protected or enhanced were sought by the Environment Agency (465).
- Referring to Water Framework Directive objectives was advocated by the Environment Agency (465), e.g. how heavily modified waterbodies and obstructions may prevent good ecological status from being achieved.
- In order to reflect the implications of the new statutory biodiversity net gain metric and how it considers watercourses, there was a need to revisit the policy wording according to the Home Builders Federation (414).
- Inconsistency with national planning policy was raised by Anchor (346) in its objection. They considered that the provision which expected the conservation of waterways and adjacent land did not accord with national policy which allowed mitigation and compensation if harm to biodiversity could not be avoided.
- Reference to delivering additional flood resilience measures (second criterion in numbered list) was objected to by Sovereign Network Group (461). They felt it should acknowledge considerations of viability, its relationship to the development and whether it was necessary to make the development acceptable.
- A lack of flexibility was cited by Anchor (346) in its objection. They referred to the provision that development would be expected to maintain, enhance and create green infrastructure for walking and cycle (fourth criterion in numbered list) and considered that this would not always be feasible or viable.
- An objection to the policy was made by CBRE Investment Management (471) and Sovereign Network Group (461) who felt its recreational and biodiversity objectives could not be mutually achieved and so should be separated into distinct policies.
- Regarding the explanatory text concerning canted, colonnaded and floating waterside walkway solutions (para. 9.1.43), CBRE Investment Management (471) and Sovereign Network Group (461) sought the inclusion of text to make clear that the council would facilitate and support the viability of any waterside walkway on land it owns. It also sought clarity that such walkways would not be required where the waterway falls within the Crown’s ownership.

- Objection to areas no longer being designated in the Local Plan as Wildlife Corridors was made by Bristol Business Improvement Districts (423).
- Stronger emphasis on creating areas for people to sit in balance with improvements to biodiversity was advocated by Bristol Business Improvement Districts (423).
- More stringent wording was sought by Bristol Parks Forum (495) and Manor Woods Valley Group (63), with 'required to' being preferred to 'expected to'.
- A perceived lack of clarity in the policy wording was of concern to Dominic Hogg (448).

Policy BG6: Private gardens

Representations received: 5 Object: 5 Support: 0

- An additional criterion to allow development leading to the loss of gardens was sought by WeCanMake (446). This related to proposals for community-led affordable housing which safeguards the amenity of existing development.
- Additional text to the policy's first criterion was suggested by the Westbury-on-Trym Society (229) to ensure other Local Plan policy objectives were met by development proposals in gardens; namely biodiversity, green infrastructure, liveability, flood risk and water management.
- Regarding the policy's reference to development involving front gardens, provisions which addressed the treatment of balconies facing the public realm were sought by Bristol Business Improvement Districts (423), including their greening to enhance visual impact.
- A perceived lack of clarity in the policy wording was of concern to Dominic Hogg (448).

Policy BG7: The St. Paul's green link

Representations received: 5 Object: 3 Support: 2

- More stringent policy text was sought by Dominic Hogg (448), e.g. 'requiring' rather than 'expecting'.
- Bristol Business Improvement Districts (423) thought a map could be included to indicate the link's route.
- Support was received from Friends of St Andrews Park (125).

Open space

Policy GI A: Open space for recreation

Representations received: 14 Object: 13 Support: 1

- Concerns were raised about the policy's evidence base, with AEW UK Investment Management (458), Bristol Civic Society (285), Bristol Tree Forum (148) and Knowle Neighbourhood Planning Group (372) noting the absence of an up-to-date assessment of the need for open space.

- The policy's failure to set quantity and quality standards for open space provision was raised by Dandara Living Developments Ltd (430), AEW UK Investment Management (458) and Bristol Civic Society (285) in their objections.
- A lack of clarity in the policy was raised by a number of representors:
 - Reference to 'council's strategies' in the policy text was queried by Bristol Civic Society (285), Bristol Parks Forum (495), Bristol Tree Forum (148) and Dandara Living Developments Ltd (430).
 - A failure to define thresholds regarding an 'appropriate minimum size and quality' in the policy's first criterion relating to the provision of open space for recreation was objected to by AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (482) and Sovereign Network Group (461).
 - Concern that the reference to 'suitable long-term maintenance programme' in the fifth criterion lacked adequate timeframe precision was of concern to AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (482) and Sovereign Network Group (461).
 - A definition of 'accessible' open space was sought by Fishponds Community Planning Group (190).
 - Dominic Hogg (448) considered the policy 'nebulous'.
- More stringent wording was sought by Bristol Parks Forum (495) with 'required to' preferred to 'expected to'.
- The absence of proposals for significant new public open spaces and / or recreation areas was of concern to Bristol Tree Forum (148) and Friends of St Andrews Park (125).
- The reference in para. 9.2.2 to the overall proportion of open space being maintained should also include 'and enhanced' according to Bristol Parks Forum (495).
- Regarding the provision of recreational spaces, specific requirements were sought by John Knight (126) for hard surface and grassed areas, as well as children's play, walking and mountain biking areas.

Policy GI1: Local Green Space

Representations received: 100 Object: 39 Support: 61

- Objection was made to the failure to designate as Local Green Space the following areas / sites:
 - All Reserved Open Green Space sites (representation by Friends of Badock's Wood (456))
 - All Sites of Nature Conservation Interest (representation by Bristol Tree Forum (148) and Bristol Parks Forum (495))

- An area of land adjacent to the River Frome extending to the South Gloucestershire boundary, adjoining Lincombe Barn Woods (representation by Fiona Gleed (287))
- Bracey Drive open space (representation by Nick Lee (180), Kelly Lee (181), Chris Jarvis (182), Laura Jarvis (183), Pauline Twomey (184), Andrew Searle (185) and Fari Lonergan (186))
- Bristol to Bath Railway Path (representation by Owen Square Park Pals (462), Liz Beth (214), Poppy Keeling (246), Rachael Bee (263), Sophia Walcot-Earle (274) and Nikki Petch (264))
- Cumberland Piazza and other Sylvia Crowe-designed green spaces in Cumberland Basin (representation by Hotwells and Cliftonwood Community Association (261), Ginny Mason (319) and Cumberland Basin Stakeholder Group (398))
- Green open spaces around the Floating Harbour and the A and B Bond warehouse buildings in the Hotwells / Western Harbour area (representation by Hotwells and Cliftonwood Community Association (261) and Ginny Mason (319))
- Malago Riverside walk, north of Cotswold Road (representation by Windmill Hill and Malago Planning Group (174))
- Oldbury Court Estate:
 - footpath on left bank of River Frome leading to wildlife area behind Lincombe Barn
 - the area along the treeline on Sheldrake Drive
 (representation by Friends of the Park (Oldbury Court Estate) (295))
- Providence Place / Bedminster Green (representation by Windmill Hill and Malago Planning Group (174))
- Southmead:
 - Trym Valley Open Space
 - Green Land at Greenway Centre
 - Westbury Wildlife Park
 - Southmead Allotments
 (representation by Friends of Badock's Wood (456))
- Objection was made to the following areas / sites proposed for Local Green Space designation:
 - Land at Henbury adjoining Kings Weston Lane (representation by Stride Brothers Ltd (21))
 - Land at Lamplighters Marsh, Shirehampton (representation by Mr N. Bracey (452))

- Stoke Lodge (representation by Cotham School (168))
- Support was received for the following areas / sites proposed for Local Green Space designation:
 - ‘Northern Slopes’:
 - ‘The Bommie’ (Wedmore Vale) between Daventry Road, Beckington Road, Wedmore Vale and Wingfield Road), Bramble Farm (between Stockwood Crescent and Beckington Road)
 - Glyn Vale between Glyn Vale, Wedmore Vale and Kenmare Road
 - Kingswear Road Open Space between Glyn Vale and Oakhill Drive and Sidford Road
 - Novers Common/Steps between Novers Hill, Lynton Road and the Health Park as Local Green Space

(representation by Northern Slopes Initiative (158))
 - ‘The Novers’:
 - areas located between the Knowle West Health Park, Haldon Close, Kingswear Road and the Novers Steps

(representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373) and Northern Slopes Initiative (158))
 - Shirehampton:
 - Lamplighter’s Marsh Local Nature Reserve;
 - Nibley Road Open Space and Lamplighter’s Open Space;
 - The Daisy Field.

(representation by John Knight (126))
 - Southmead:
 - Badock’s Wood
 - Doncaster Road Park
 - Henleaze Lake
 - Pen Park Open Space
 - Elderberry Walk Open Space

(representation by Friends of Badock’s Wood (456))
 - Stoke Lodge

(representation by over thirty members of the public)
 - Troopers Hill:
 - Troopers Hill Local Nature Reserve

- Troopers Hill Field
- Troopers Hill Woodland and
- Blackswarth Road Wood

(representation by Friends of Troopers Hill (149))

- 'Western Slopes' / Novers Hill sites allocated for housing or industry and warehousing in the current Local Plan:

- BSA1108 - Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane/ Novers Hill
- BSA1114 - Land at Novers Hill, adjacent to industrial units
- BSA1119 - Land to east of Hartcliffe Way, south of the Waste Depot

(representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Catherine Withers (153), Jim Mayger (97), June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Fran Whitlock (110), Thomas Lewis (111), Julia Halpenny (113), Sue Chubb (124), Bridget Bennett (154), Hilary Rydon (156), Anna Tucker (98), Catherine Robson (150), Luke Collins (152), Richard Sawyer (165), Nick Smith (293), Nasim Dumont (330), Gerard Spillane (348), James Drozd (351), Alison Parker (333), Danielle McKenzie (335), Martyn Cordey (359), Gerard Spillane (348) and Tony Pitt (317))

- Regarding the policy text's second sentence and the assessment of harm, Bristol Parks Forum (495) thought additional reference should be made to the impact of development on the Local Green Space's 'existing functions'.
- To improve its clarity, adding 'within Local Green Space' into the policy text after 'Ancillary development' was suggested by Dandara Living Developments Ltd (430).
- Support for not designating New Oak Primary School and the John Williams Secondary School and its surrounding land as Local Green Space (or any other Local Plan open space designation) was made by Oasis Community Learning (378).
- Your Park Bristol & Bath (395) and Manor Woods Valley Group (63) offered support to the policy.
- Bristol Tree Forum (148) considered that 84 sites which were designated in the current Local Plan as Important Open Space are not proposed for Local Green Space or Reserved Open Green Space designation under the new Local Plan. It also stated that 24 current allotments are not proposed for Local Green Space or Reserved Open Green Space designation.

- The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).
- A consistent definition of open space which ensures it is accessible was sought by Dr. Antonia Layard (421).
- Whether playing pitches were protected as Local Green Space was unclear to Sport England (485).

Policy GI2: Reserved Open Green Space

Representations received: 45 Object: 24 Support: 21

- Objection was made to the following areas / sites proposed for Reserved Open Green Space designation:
 - Brislington Meadows, land at Broom Hill (representation by Homes England (231))
 - Clifton College’s Main Campus and College Fields playing fields (representation by Clifton College (419))
 - Land at Glenside Campus (representation by University of the West of England (408))
 - Land at Golden Hill (representation by Bristol Grammar School (422))
- Objection was made to the failure to designate as Reserved Open Green Space the following areas / sites:
 - Area of land to the west of Haldon Close, which includes the bases of former prefabs, at the back of houses on Lynton Road and below ‘the Novers’ (representation by Northern Slopes Initiative (158))
 - Cluster of trees adjacent to Frenchay Road at Frome Vale Academy (representation by Fiona Gleed (287))
 - Eastern and western areas of open space with boundary trees / hedges at Begbrook Primary Academy (representation by Fiona Gleed (287))
 - Grassland alongside Sheldrake Drive, Stapleton (representation by Fiona Gleed (287))
 - Land proposed to be allocated for housing under Policy DA1: ‘Proposed development allocations’, development allocation ref. BDA1302 ‘Land south of Rose Green Close, Clay Hill’ (representation by Gillian Lowe (259))
 - Open green space to the west of Manning Road known as Filwood Park (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373))
 - Open green space between Marshall Walk and the Inns Court Community Centre (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373))

- Open green space outside St Barnabas Church, Daventry Road (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373))
- Open green space within the Knowle West Health Park (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373))
- Open green space in the centre of Melvin Square (representation by Knowle West Regeneration Residents Planning Group / Knowle West Future (373))
- 'The Green', Freeland Place, Hotwells between no.s 23 and 26 on the south side of the road (representation by Sandra Fryer (95))
- Support was received for the following areas / sites proposed for Reserved Open Green Space designation:
 - Brislington Meadows (representation by Friends of Novers Hill and Crox Bottom (Western Slopes) (155), Jim Mayger (97), Richard Sawyer (165), Nick Smith (293), Martyn Cordey (359), Luke Collins (152), Anna Tucker (98), June Goulding (103), Holly Tipping (104), Tim Marriner (105), Jasmine Beard (107), Fran Whitlock (110), Thomas Lewis (111), Julia Halpenny (113), Sue Chubb (124), Catherine Withers (153), Bridget Bennett (154) and Hilary Rydon (156)
 - Green space outside the shops on Gill Avenue (representation by Friends of the Park (Oldbury Court Estate) (295))
- Concern about a lack of clarity in the policy's first criterion was raised by the Parochial Church Council of St Mary Redcliffe (399) in its objection. They thought the reference to 'open space function' did not give a clear indication of the function and value to be assigned to these spaces for the purposes of assessing development proposals.
- Deleting the policy's second criterion was advocated by the Parochial Church Council of St Mary Redcliffe (399). They objected to its reference to Policy GI A 'Open space for recreation' as they considered that policy related to the provision of open space in new development rather than existing open areas.
- Additional policy criteria were suggested by two representors:
 - the Parochial Church Council of St Mary Redcliffe (399) suggested detailed text in support of the principle of allowing ancillary development in those circumstances where areas of Reserved Open Green Space were ancillary to community facilities on the wider site.
 - Bristol Grammar School (422) advocated text which would allow the loss of Reserved Open Green Space where it could be appropriately mitigated.
- Clifton College (419) advocated amendments to the policy criteria:
 - They thought that either of the criteria could be met to allow the loss of land designated as Reserved Open Green Space rather than both.

- They sought the addition of ‘publicly accessible’ ahead of ‘open space provision’ in the second criterion to reflect the fact that their site is not accessible to the public.
- Bristol Tree Forum (148) considered that 84 sites which were designated in the current Local Plan as Important Open Space are not proposed for Local Green Space or Reserved Open Green Space designation under the new Local Plan. It also stated that 24 current allotments are not proposed for Local Green Space or Reserved Open Green Space designation.
- The need to re-draft the policy to reflect Regulations published by the Government to take effect in February 2024 regarding biodiversity net gain was advised by Bristol Tree Forum (148).
- Concern that the policy lacked clarity was raised by Dominic Hogg (448), who questioned how a deficiency in open space provision could be assessed.

Policy GI3: Incidental Open Spaces

Representations received: 10 Object: 9 Support: 1

- Objections to this policy raised the following concerns:
 - too restrictive (representation by Gloucestershire County Cricket Club (447), Taylor Wimpey (347) and Sovereign Network Group (461));
 - lacking clarity in its definitions (representation by Gloucestershire County Cricket Club (447));
 - inadequate evidence to justify approach (representation by Taylor Wimpey (347) and Sovereign Network Group (461));
 - unnecessary as protection of such spaces on housing estates would be controlled by a management company in accordance with legal obligations (representation by Taylor Wimpey (347) and Sovereign Network Group (461));
 - inconsistent with protection of the local environment and meeting housing need (representation by Stride Brothers Ltd (21)).
- The policy was welcomed by Your Park Bristol & Bath (395) and CPRE Avon and Bristol (492), although the latter representor was concerned whether it would be effective in protecting these spaces.
- Additional policy text to prevent the loss of incidental open space if the local community had not been consulted was sought by Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Knowle Neighbourhood Planning Group (372) and Bristol Parks Forum (495).
- An approach which prevented the loss of any incidental open space was suggested by Dominic Hogg (448).

Policy GI4: Stapleton allotments and holdings – food growing Local Green Space

- No representations received.

Transport

Policy T1: Development and transport principles

Representations received: 11 Object: 8 Support: 3

- Hotwells and Cliftonwood Community Association (261) were critical of a lack of strategic transport policy setting out the city-region's traffic and transport needs and how these impact on the city in relation to the requirements needed from individual schemes.
- Lack of reference to a coach park was of concern to Visit West - Local Visitor Economy Partnership (306) in relation to the contribution visitors arriving by coach make to the city's economy.
- More stringent policy wording was sought by Bristol Cycling Campaign (416) and David Gray (303), e.g. development 'must' rather than 'should'.
- Specific additions / amendments were sought by Bristol Business Improvement Districts (423):
 - Include a Transport Hierarchy to set out the prioritisation of transport modes for the city;
 - Reference the target of zero road deaths by 2030;
 - Adopt the Healthy Streets approach as a formal assessment of street design and transport schemes.
 - Refer to health in relation to the contribution that transport can make to improving health outcomes.

They also supported the development of a Bristol Transport Plan

- John Knight (126) sought greater emphasis on how the policy will enhance the safety of vulnerable road users on new and existing routes.

Policy T2: Transport infrastructure improvements

Representations received: 6 Object: 2 Support: 4

- The lack of a strategic transport evidence base to inform the policy and identify any impacts on the strategic road network was of concern to National Highways (473). Similarly, Bath and North East Somerset Council (496) noted they were unable to identify detailed assessment of the transportation impacts of the proposals, in particular on its network.
- Clarity on the relationship between the policy and the Infrastructure Delivery Plan was sought by National Highways (473). For example, a Park & Ride for the M32 is referenced in the Infrastructure Delivery Plan Draft with delivery by 2027 but not included in the policy.
- Natural England (489) highlighted the importance of ensuring any transport improvements create and enhance links to greenspace, countryside and the green infrastructure network.

- The potential for high carbon emissions in the construction of major transport infrastructure improvements, such as a new mass transit network, was of concern to Dominic Hogg (448).

Policy T2A: Protected transport and movement routes

Representations received: 5 Object: 5 Support: 0

- Objection to the proposed Rail Infrastructure safeguarding for land in St Philip’s / Lawrence Hill to the south of the Bristol and Bath Railway Path was made by:
 - Frank Bruce and Company Limited (493), who considered it should be removed as was unjustified and could hinder the achievement of the wider growth and regeneration objectives of the surrounding area;
 - Old Market Community Association (233), who thought it had been unused for rail for many years and should be safeguarded as a future cycle route.
- Regarding the proposed Safeguarded Transport Link designation for the Callington Road link on former railway line land in Brislington:
 - Dominus Real Estate (289) queried the evidence to justify this designation;
 - Sovereign Network Group (461) thought specific text should be added to make clear support would be given for active travel infrastructure and that proposals for new infrastructure for private cars would be opposed.
- Amending the policy text to make clear that, where new transport infrastructure is proposed within a safeguarded area, active and sustainable travel modes will be prioritised and new roads for cars supported only exceptionally was urged by Sovereign Network Group (461).

Policy T3A: Transport development management

Representations received: 2 Object: 2 Support: 0

- The policy text’s first criterion regarding securing low vehicle speeds was objected to by National Highways (473). They thought an amendment was needed to address developments which affect the strategic road network where securing low speeds would not be appropriate.
- An addition to the last sentence of the policy text regarding proposals being supported by a Transport Assessment/Statement and/or a Travel Plan was requested by National Highways (473). As well as a significant traffic impact, they thought such requirements would also be needed where there is likely to be a road safety impact.

Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles

Representations received: 7 Object: 5 Support: 2

- Concerns about the appropriateness of deferring policy guidance and standards to a forthcoming Transport Supplementary Planning Document were raised by

Legal and General (409), Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (483).

- Lack of evidence that the policy had been viability tested was raised by Legal and General (409).
- Removal of the policy's 'Electric vehicle charging' section was urged by the South West Housing Association Planning Consortium (439). They thought it duplicated measures required for compliance with building regulations.

Policy T5: Public rights of way

Representations received: 1 Object: 1 Support: 0

- Rather than only protecting and enhancing public rights of way, CPRE Avon and Bristol (492) thought the first sentence of the policy text should be strengthened to include reference to increasing the numbers of public rights of way.
- Regarding the second sentence of the policy text relating to where diversions of public rights of way may be appropriate, CPRE Avon and Bristol (492) thought that an additional consideration relating to the historic importance of the public right of way should be added.

Policy T6: Active travel routes

Representations received: 3 Object: 2 Support: 1

- Natural England (489) commented that active travel routes should enhance nature recovery and green / blue infrastructure networks.
- More stringent policy wording was sought by Bristol Cycling Campaign (416), e.g. development 'must' rather than 'where possible'.
- Regarding the reference in para. 10.49 to Design and Access Statements and Transport Statements, Bristol Parks Forum (495) thought additional text should be provided to ensure these assessments report on the identification and consideration of the existing functions of the area and describe solutions to how those functions can be maintained or improved in the area.

Community facilities

Policy CF1: Provision of community facilities

Representations received: 22 Object: 21 Support: 1

- The policy's expectation that major developments likely to generate a need for new or extended community facilities will be expected to provide a minimum of 10% of ground floor space for use by a community group was objected to for the following reasons:
 - Lack of clarity on:
 - how the need for new or extended community facilities generated by the development would be assessed (representation by Dandara Living Developments Ltd (430), Sovereign Network Group

(461), Watkin Jones (437), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472));

- how the policy relates to the use of Community Infrastructure Levy (representation by Watkin Jones (437) and Sovereign Network Group (461)) and Section 106 contributions (representation by Sovereign Network Group (461)), i.e. there are mechanisms already in place to secure community infrastructure or mitigate impacts so no new policy should be needed;
 - how the 10% measurement would be made, e.g. gross or net floorspace (representation by Watkin Jones (437));
 - what is affordable rent (representation by Watkin Jones (437));
 - whether viability cases can be made for non-compliance with the policy (representation by Watkin Jones (437));
 - potential mechanisms to secure affordable floorspace, e.g. the council leasing floorspace at market rates then subleasing this floorspace at a discounted rate (representation by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472)).
- Lack of practicality:
 - for many mixed-use schemes 10% of ground floor space would not create useable space (representation by Watkin Jones (437))
 - there are competing interests for ground floor space within mixed use development, e.g. secure cycle storage, plant space for mechanical and energy infrastructure, etc (representation by Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472))
 - Lack of evidence:
 - to justify the provision of 10% of ground floor space and affordable rent (representation by Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Gloucestershire County Cricket Club (447), Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472))
 - on the need for new community facilities (representation by Watkin Jones (437))
 - assessing impacts on scheme viability (representation by Watkin Jones (437)).

- Failure of the policy text to reflect scheme viability considerations (representation by AEW UK Investment Management (458) and Science Creates (445), who suggested additional text to address this)
- Failure of policy text to include reference to provision of ground floor space only where interest / market exists (representation by AEW UK Investment Management (458))
- Failure of policy text to include a clawback mechanism for floorspace allocated for community use to be released for alternative uses if there is no interest in the space (representation by AEW UK Investment Management (458))
- Lack of flexibility, e.g. policy should allow financial contributions to off-site provision or enhancement to existing facilities (representation by Orangestar Capital (Globe Bristol) Ltd (441)).
- Additional policy text was sought by NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468) to permit the NHS to utilise new community facilities when necessary to deliver NHS community services.
- Dandara Living Developments Ltd (430) considered there was an inconsistency between the policy's expectation that new community facilities should be located within existing centres and the Development Strategy's policies which seek community facilities within the growth and regeneration areas.
- A lack of clarity on how the need for new community facilities would be assessed was raised by a Hotwells and Cliftonwood Community Association (261), who sought a new community services hub located at the B Bond Warehouse building.

Policy CF2: Retention of community facilities

Representations received: 6 Object: 6 Support: 0

- The uses covered by this policy were considered too broad by Sovereign Network Group (461), Gloucestershire County Cricket Club (447), Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (474) and in their objections:
 - Amending the policy to make clear that community uses are those falling within Use Class F2 of the Use Classes Order was advocated by Sovereign Network Group (461), Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (474).
 - Sovereign Network Group (461) also thought the policy should be amended to make clear that any uses that it seeks to protect that fall outside of Use Class F2 should be limited to Use Class F1 uses.
 - Gloucestershire County Cricket Club (447) considered that community facilities were more akin to uses that are managed, occupied or used primarily by the voluntary and community sector for community-led

activities. They sought greater differentiation in the policy regarding private / commercial enterprises that provide community benefits.

- Specific policy provisions which ensured healthcare facilities proposed for disposal would not be required to retain any part of the site for alternative community use were sought by NHS Property Services Ltd (375) and NHS Bristol, North Somerset, and South Gloucestershire Integrated Care Board (468).
- The failure of the policy to express clear support for development that would ensure the retention, improvement and extension of existing community facilities was objected to by the Parochial Church Council of St Mary Redcliffe (399).
- Regarding the reference in para. 11.14 to the council considering the need for appropriate replacement facilities in line with community needs, Bristol Parks Forum (495) thought text should be added to ensure those facilities were co-designed with the community.

Net zero and climate

Chapter-wide issues

- Written Ministerial Statement on Local Energy Efficiency Standards:
 - A number of representors from the development industry noted the impact of the 13 December 2023 Written Ministerial Statement and felt policies NZC 1-4 should be either removed or amended accordingly.
- Representors identified a number of concerns with the policies as a whole:
 - Interaction between planning policy and building regulations:
 - The planning system should not set out requirements that would be met through building regulations and instead should focus on ensuring development is sustainably located according to AEW Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (478), Sovereign Network Group (461) and Elizabeth Blackwell Properties (189).
 - Overly onerous and likely to affect scheme deliverability was the view of Esteban Investments Ltd (420), Legal and General (409), Yara Capital (426), Fusion Group, (396), Argo Real Estate Management Ltd (491) and Orangestar Capital (441).
 - Too prescriptive and duplicating national policy was the concern of AEW UK Investment Management (458).
 - A lack of evidence to support targets or offset rates was raised by Hoare Lea (400).
 - Future Homes Standard:

- As the introduction of Future Homes Standard is scheduled for 2030, the need for local plan targets was questioned by AEW Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (478), Sovereign Network Group (461) and Elizabeth Blackwell Properties (189).
 - Need for viability testing:
 - Due to forthcoming changes to building regulations and the Future Homes Standard, any alternative policy approaches should be subject to robust viability testing according to Gloucestershire County Cricket Club (447).
 - Lack of clarity on application requirements:
 - As the policies require significant additional application stage information to be submitted, clear guidance on these information requirements was sought by Bristol Temple Quarter Delivery Team (296).
 - There was a failure to address emissions caused by commuting according to David Gray (303).

Policy NZC1: Climate change, sustainable design and construction

Representations received: 26 Object: 20 Support: 6

- ‘Mitigating and adapting to climate change’ section of policy text:
 - The Home Builders Federation (414) regarded this part of the policy text as only referencing other policies in the chapter so thought it should be deleted as superfluous.
 - St Mowden Logistics (379) thought that use of ‘minimising’ and ‘maximising’ set open-ended requirements which could have unintended consequences on the viability of development. They favoured replacing ‘minimising’ with ‘reducing’ and ‘maximising’ with ‘provision’.
 - Regarding the reference to sustainability statements, mention should be made of IEMA guidance to ensure sustainability statements consider all potential climate impacts according to Hoare Lee (400).
- ‘Sustainable Design Standards’ section of policy text:
 - BREEAM ‘Excellent’ rating requirement:
 - More flexibility in the policy wording was sought by St Mowden Logistics (379) and Clifton College (419) to recognise where site constraints mean it is not possible to achieve the requirement. Science Creates (445) also identified concerns over impacts on scheme deliverability in the deep-tech and wider Research and Development sector.

- The delivery of the requirement was also questioned by St Mowden Logistics (379) given that BREEAM version 7 was due to be released in 2024 and the extent of updates were currently unknown.
 - BREEAM Communities ‘Excellent’ rating requirement:
 - Regarded as onerous by Dandara Living Developments Ltd (430), who sought more flexibility.
 - Amending the policy wording to make clear that, for developments of more than 200 dwellings which seek certification under the Home Quality Mark, they should be excluded from the BREEAM Communities requirement, was advocated by Hoare Lee (400).
 - BREEAM Communities was considered to be an outdated and impractical framework and reference should be removed according to Bellway Strategic Land (464).
 - Lack of clarity on the term ‘mixed use’ was of concern to Dandara Living Developments Ltd (430).
- ‘Water Efficiency’ section of policy text and its proposed water efficiency standard:
 - Welcomed by Bristol Water (417).
 - Insufficiently ambitious according to the Environment Agency (465).
 - Objected to by the Home Builders Federation (414). They felt developers are frequently building to this standard and any updates to building regulations may render it obsolete.
- Reference to Sustainable Design Standards in explanatory text (paras. 12.1.8 – 12.1.11):
 - Avon and Somerset Police (59) sought inclusion of reference to the Secured by Design initiative.
 - The reference in para. 12.1.8 to BREEAM methods being used ‘unless replaced by another standard which is approved by the local planning authority’ was objected to Clifton College (419). They thought it should be included within the policy text.
- CPRE Avon and Bristol (492) thought that the level of development proposed in the plan is incompatible with mitigating its associated contribution towards the drivers of climate change.

Policy NZC2: Net zero carbon development – operational carbon

Representations received: 38 Object: 30 Support: 8

- Written Ministerial Statement on Local Energy Efficiency Standards:

- A number of representors highlighted the 13 December 2023 Written Ministerial Statement:
 - Relying on building regulations to manage energy efficiency in new buildings rather than local plan policy was the approach advocated by the Home Builders Federation (414).
 - ClientEarth (230) noted that the Written Ministerial Statement does not preclude local authorities setting energy efficiency standards which go beyond building regulations.
 - Scheme viability could be affected by the policy's proposed standards according to Abri (163), Anchor (346) and St Mowden Logistics (379). They thought the policy should be thoroughly viability- and feasibility-tested if retained.
 - Hoare Lee (400) thought that, in line with the Town and Country Planning Association's response to the Written Ministerial Statement, if the council wishes to pursue its current approach, it will need to be thoroughly evidenced.
- 'Specific standards for development' section of policy text:
 - Mark Letcher (244) and Max Fordham LLP (387) thought the approach for using space heating targets and energy use intensity targets should apply to all buildings, including non-residential buildings.
 - The Centre for Sustainable Energy (413) sought specific targets for non-major commercial development.
 - Space heating demand requirement (first bullet point):
 - This was too vague according to Mark Letcher who feared the 20kwh/m2/year target will be defaulted to.
 - Energy use intensity standard (second bullet point):
 - The 35kwh/m2/year requirement was regarded as unreasonably onerous by Conygar Bristol Ltd (403) and Central Fishponds Ltd (405), who thought it should be expressed as a range of 35-55kwh/m2/year.
 - Live West (245) were concerned that the maximum energy use intensity target will make it more difficult to deliver low density housing types. They felt it would instead favour higher concentrations of apartments which are less adaptable to meet occupiers changing needs.
 - Unite Group Plc (457) considered that, if the 35kWh/m2/year requirement includes both regulated and unregulated loads, it will be very difficult to achieve.
 - The Centre for Sustainable Energy (413) supported the use of an energy use intensity metric as they considered it a more robust,

clear and quantifiable means of assessing both energy efficiency and its associated offset.

- Max Fordham LLP (387) thought that energy use intensity should also apply to refurbishment and reuse of existing buildings as these will form a considerable portion of development.
- St Mowden Logistics (379) thought that any energy use target in the policy which is based on third party guidance, such as BREEAM, should reference the relevant version on which feasibility and viability assessments have been based. Therefore, BREEAM 6 should be specified.
- On-site renewable electricity generation requirement (third bullet point):
 - This could place additional cost burdens on development according to LiveWest (245).
 - Central Fishponds Ltd (405) thought the requirement would not be achievable for higher density schemes. Whilst offsetting is available, they did not consider it prudent to propose a requirement that will not be achievable.
- ‘Energy offsetting’ section of policy text:
 - Amendment to allow housing associations to demonstrate an investment in the decarbonisation of their housing stock as a way of meeting the policy’s offset requirements was sought by Live West (245) and South West Housing Association Planning Consortium (439).
 - St Mowden Logistics (379) and Central Fishponds Ltd (405) thought that the requirement for energy offsetting is not consistent with the Written Ministerial Statement (13/12/2023) as they refer to energy and should be expressed in terms of carbon.
 - Regarding the reference in the second paragraph to the financial contribution being in a one-off payment, specifying Section 106 agreements as the primary means for managing offsite contributions was advocated by Clifton College (419).
 - Further details of the contributions expected for offsetting requirements and the demonstration of viability were sought by Dandara Living Developments Ltd (430).
- ‘Heating and Cooling Systems’ section of policy text:
 - Deleting the text explaining the cooling hierarchy (fourth paragraph and accompanying bullet points) and inserting it into Policy NZC4 was advocated by Mark Letcher (244).
 - Regarding the reference to proposals for more than 100 homes or 10,000m² floorspace to consider the creation of new heat networks, Central Fishponds Ltd (405) and Dandara Living Developments Ltd (430)

thought this should be led by Bristol City Leap or the council rather than developers.

- Dandara Living Developments Ltd (430) objected to the requirement for development to connect to existing or new heat network where the system does not currently exist.
- Dandara Living Developments (430) Ltd raised concern at the requirement that individual or communal heating systems will not be permitted to use fossil fuels, whereas developments which connect to heat networks will have no such requirement. They thought connections to heat networks should only be required where the network is fossil fuel free.
- Bellway Strategic Land (464) thought that the specific standards in the policy needed to be justified and evidence-based, as well as viability tested.
- The focus should be on regulated rather than unregulated emissions / demand according to Live West (245), Hoare Lee (400) and St Mowden Logistics (329). The latter representor thought it was unreasonable for developers of non-residential schemes to be responsible for the emissions of the occupant.
- Anchor (346) highlighted the 14 March 2015 Written Ministerial Statement which precluded the ability of local authorities to set energy efficiency standards that go beyond building regulations. Consequently they considered policies NZC2, NZC3 and NZC4 should not be included in the local plan.
- The perceived failure of the policy to require a Passivhaus standard (or equivalent) as minimum was of concern to Sara Grimes (203) and ClientEarth (230).
- Requirements and energy models proposed should be applied flexibly when considering the retrofit of heritage assets according to Clifton College (419). They recommended a reference be made to the plan's heritage policies to strengthen this.
- Amending the policy to preclude the installation of solid fuel heating, in particular wood-burning stoves, was advocated by ElhPlan (404).
- Support for the policy was received from Vattenfall Heat UK (294), in particular its support for the expansion of the city's heat network.
- Considering whether offsetting funds could be used to promote the decarbonisation of the healthcare system was requested by NHS Property Services Ltd (375).

Policy NZC3: Embodied carbon, materials and circular economy

Representations received: 25 Object: 24 Support: 1

- 'Embodied carbon – major applications' section of policy text:

- Central Fishponds Ltd (405) thought the policy's targets would have an undue impact on construction costs and therefore the viability of development.
 - Concern over the targets and offsetting costs was expressed by St Modwen Logistics (379) and Conygar Bristol Ltd (403), arguing that the targets proposed go beyond current good practice.
 - Evidence demonstrating how the targets have been determined was sought by the South West Housing Association Planning Consortium (439).
 - Insufficient justification for using the government's Green Book's higher cost scenario for offsetting was of concern to St Modwen Logistics (379).
 - The standard for taller buildings (5 storeys or greater) was not appropriate according to Bristol Civic Society (285) as they thought it would encourage a less sustainable building form.
 - Including a mechanism for the periodic review of the embodied carbon targets was sought by Mark Letcher (244). He felt they were likely to become out of date as industry adapts to the initial targets.
- Due to the absence of an assessment of the predicted emissions resulting from the plan's strategy, Bristol Civic Society (285) questioned whether the plan is consistent with the Climate Change Act 2008, the Sixth Carbon Budget and their implications when read in conjunction with the NPPF. They felt the targets in the policy should be more ambitious so as to ensure net zero is actually achieved. The Centre for Sustainable Energy (413) endorsed the Civic Society's comments.
 - Regarding the requirement to carry out embodied carbon assessments, the Home Builders Federation (414) thought it will be necessary to consider the implications for the preparation of any assessment, particularly in relation to the availability of any data required and that responsibility for many emissions will lie in areas outside of the control of developers (e.g. material extraction, transportation, etc). They advocated a transitional period to allow industry and supply chain to adjust to the requirements.
 - Anchor (346) highlighted the 14 March 2015 Written Ministerial Statement which precluded the ability of local authorities to set energy efficiency standards that go beyond building regulations. Consequently they considered policies NZC2, NZC3 and NZC4 should not be included in the local plan.
 - The creation of a draft climate adaptation strategy to be prepared to assist applicants and officers in implementing the policy was suggested by the South West Housing Association Planning Consortium (439).
 - Use of the words 'minimising' and 'maximising' throughout the policy was of concern to St Modwen Logistics (379). They thought this makes the policy requirements too open-ended which could impact on the feasibility and viability of development.

Policy NZC4: Adaptation to a changing climate

Representations received: 18 Object: 17 Support: 1

- Wessex Water (112) thought that greater focus needed to be given to rainwater management and collection, as well as sewer flooding and storm overflows.
- A number of representors thought the policy does not provide sufficient detail as to how its requirements should be met. The Home Builders Federation (414), for example, highlighted that it does not set out criteria as to what level of mitigation and management of climate risk would be deemed acceptable.
- Mark Letcher (244) thought that it will be difficult for smaller developments to demonstrate compliance with the policy, and proposed a more streamlined approach.
- Natural England (489) and CPRE Avon and Bristol (492) recommended strengthening the policy's wording, such as changing 'should' to 'must'.
- Anchor (346) highlighted the 14 March 2015 Written Ministerial Statement which precluded the ability of local authorities to set energy efficiency standards that go beyond building regulations. Consequently they considered policies NZC2, NZC3 and NZC4 should not be included in the local plan.
- Within the policy's 'General principles' section and its third bullet point, Bristol Parks Forum (495) sought the inclusion of 'health and well-being' as a benefit alongside climate adaption and biodiversity.

Policy NZC5: Renewable energy and energy efficiency

Representations received: 7 Object: 5 Support: 2

- Natural England (489) highlighted the need for evidence to demonstrate the appropriateness of new renewable energy capacity and energy storage in the Avonmouth Industrial and Bristol Port area given the location's ecological importance.
- CPRE Avon and Bristol (492) thought that solar energy generation that does not require building on greenfield land should be prioritised, such as roof top solar or over car parks.
- The Home Builders Federation (414) observed that heat networks are often powered by non-renewable sources. They thought that it may be more sustainable for some development to utilise other forms of energy provision.
- The Home Builders Federation (414) and LiveWest (245) considered that there is the potential for lower customer satisfaction when using a heat pump, as energy prices can often be high and they are unable to switch suppliers due to the nature of the fixed infrastructure connection.

Managing flood risk

Policy FR1: Flood risk and water management

Representations received: 7 Object: 5 Support: 2

- A number of detailed wording amendments were considered necessary by the Environment Agency (465) to ensure the policy and its explanatory text better accorded with national planning policy.
- Adding reference in the policy wording to ‘multifunctional’ Sustainable Drainage Systems was requested by Natural England (489), who also advocated mention of other nature-based solutions to water management such as trees and green / blue roofs.
- Reference to managing water stress or drought was sought by Natural England (489). They thought the policy could refer to approaches such as using rainwater harvesting in new development.
- Concerns were raised about references to the sequential test in para. 12.2.6:
 - The Environment Agency (465) considered the paragraph unclear as it seemed to indicate that no sequential test would likely be regarded by the council as having failed given the statement that there is sufficient capacity for housing development within Flood Zone 1.
 - Dandara Living Developments Ltd (430) considered there was an inconsistency between the text which stated that the development of sites in undefended Flood Zone 3 areas was not needed and the Bristol Urban Potential Assessment 2020-2040 which they felt made clear that sites outside Flood Zone 1 would be needed.
 - Dandara Living Developments Ltd (430) felt that, by stating that the sequential test had been met, this contradicted the Development Strategy’s Policies DS1-DS14 which required sequential tests to be undertaken.
 - Dominic Hogg (448) doubted that the sequential test had been meaningfully applied.
- Support for the policy was received from Wessex Water (112).

Policy FR2: Bristol Avon Flood Strategy

Representations received: 12 Object: 10 Support: 2

- The policy’s approach to securing financial contributions to future flood defences and an enhanced multi-purpose greenway (third bullet point of policy text) raised the following issues:
 - Detail on the calculations / requirements for the contributions was sought by Watkin Jones (437) and Smart Urban Living Bristol (one) Ltd (451);
 - Concern that the approach did not meet tests in national planning policy for seeking planning obligations was expressed by Sovereign Network Group (461) and Smart Urban Living Bristol (one) Ltd (451):
 - they felt that seeking potentially open-ended contributions to a capital project did not meet the test that obligations should relate to the scale and kind of the development proposed.

- they considered that if development in advance of the flood strategy was required to provide flood risk mitigation to enable the site to be safe for the lifetime of the scheme, then requiring financial contributions to strategic flood defences would not meet the test relating to obligations being necessary to make the scheme acceptable as that test would have been met through flood risk mitigation provision.
- The need to revisit the third paragraph of the policy text was advocated by Sovereign Network Group (461). This related to the expectation that development adjacent to the Flood Defence Policy Areas shown on the Policies Map would be expected to accommodate space for flood protection infrastructure. They felt that this reduced the value of showing these areas on the Policies Map as land around them would also be subject to this policy.
- The fourth paragraph of the policy text was of concern to Structadene (455). This states that development proposals would not be permitted if they prejudice the implementation of the Bristol Avon Flood Strategy. They thought clarity was needed on the requirements and implementation of the strategy, e.g. it would be necessary to understand what the strategic flood solution looks like so that development proposals can be designed and located appropriately.
- Regarding the Flood Defence Policy Areas shown on the Policies Map:
 - The Environment Agency (465) considered their alignment needed to be expanded slightly, especially around Netham, to incorporate the options for alignment in the Bristol Avon Flood Strategy's Outline Business Case.
 - Sovereign Network Group (461) thought they were inconsistent with the evidence base so that additional areas were shown on the Policies Map without apparent justification.
- The Environment Agency (465) sought detailed wording changes to the policy:
 - Within the policy text's second bullet point add 'with' between 'overtopped' and 'on-site flood defence works'.
 - Within the policy text's third paragraph and the sentence ending '...deliver flood protection infrastructure required as part of the development of the area including an enhanced greenway', replace 'including' with 'and'.
 - Add 'and river flows to increase' at the end of the sentence in para. 12.2.10 ending '...climate change causing sea levels to rise, storms to increase in frequency and severity'.
 - Replace 'design' with 'designed' in the second sentence of para. 12.2.11 and add references to improvements to biodiversity / nature.
 - The Agency thought the last two sentences of para. 12.2.12 could be removed on the grounds that they were already relying on the defences which were being referred to.

- Natural England (489) sought changes to the policy to make it clear that:
 - all development on the River Avon will be expected to contribute to the creation of a multi-purpose greenway along the river;
 - opportunities for green infrastructure that deliver flood mitigation benefits will be supported in line with the emerging Bristol Avon Flood Strategy, in line with explanatory text in para. 9.1.43 to Policy BG5 ‘Biodiversity and access to Bristol’s waterways’.
- Given the importance of the Bristol Avon Flood Strategy’s implementation in enabling the council to meet its strategic development needs, Cubex Land Limited (453) felt that the policy could provide more positive weight to schemes which deliver a greenway and flood defences, particularly as this could require a significant loss of land available on the site for development purposes.
- The Bristol Avon Flood Strategy was considered by Hotwells and Cliftonwood Community Association (261) to be ineffective, misrepresenting current flood risk and proposing inappropriate flood defence measures.
- John Knight (126) considered that Government Regulations allow other projects such as with the Environment Agency to benefit from Community Infrastructure Levy payments. He felt it important that this should be set out in the explanatory text at para. 12.2.13.

Design and Conservation

Chapter-wide issues

- Historic England (476) raised concern that the chapter did not provide a positive strategy for the historic environment as required by national planning policy. They felt it was not supported by an up-to-date evidence base, referring to ‘Our Inherited City – Bristol Heritage Framework (2015-2018)’ published in 2015. They recommended the production of a Heritage Topic Paper and a commitment to update ‘Our Inherited City’ to address this concern.
- Bristol Civic Society (285) considered there had been a failure to develop effective design policies with local communities which reflected their aspirations.

Policy DPM1: Delivering well-designed, inclusive places

Representations received: 25 Object: 20 Support: 5

- The policy was considered too restrictive by Anchor (346). They thought flexibility was needed to allow development in those circumstances where some harm might occur but which nevertheless would deliver other important planning objectives, e.g. optimising densities.
- ‘The ten characteristics of well-designed places’ section in policy text:
 - additional text clarifying that these should be taken into account only where practicable and feasible depending on individual site circumstances was sought by Argo Real Estate Management Ltd (491),

Fusion Group (396), Yara Capital (426) and Orangestar Capital (Globe Bristol) Ltd (441).

- according to Sovereign Network Group (461), contrary to para. 13.1.8, the characteristics did not reflect the National Design Code and so should be reordered with the criteria under each characteristic removed or aligned with the Code.
- regarding the 'Nature' sub-section, to strengthen the policy CPRE Avon and Bristol (492) advised adding 'protect' ahead of 'retain and integrate'.
- in relation to the 'Built form – a coherent pattern of development' sub-section, the Environment Agency (465) advised that in areas of undefended flood zone 3 or 2, active frontages will need to be safe from flooding, demonstrated through a site-specific flood risk assessment.
- 'Mixed-use development' section:
 - Was too prescriptive according to Clifton College (419). They sought additional text which supported the approach of providing a mix of uses in an overall area.
 - Additional text was needed to make clear that major development should provide a mix of uses only 'if appropriate' according to Dandara Living Developments Ltd (430).
- 'Local character and distinctiveness' section:
 - Abrdn Plc (440) and Bristol Alliance Limited Partnership (442) sought additional text to require new development to respond to emerging, as well as local, context. This was to ensure new development has suitable regard to development objectives for an area which may point to opportunities for proposals to define their own setting.
- 'Co-ordinated development' section:
 - more flexibility was sought by Argo Real Estate Management Ltd (491), AEW UK Real Estate Investment Trust, CBRE Investment Management and Taylor Wimpey (479), Sovereign Network Group (461), Yara Capital (426), Clifton College (419) and Orangestar Capital (Globe Bristol) Ltd (441), e.g. additional text to allow deliverable sites to come forward if there are complex land ownership issues or after consideration had been given to the potential for co-ordinated development.
- 'Design guides and codes' section:
 - Reliance on design codes, masterplans and spatial frameworks which have not been published nor have clear timescales for production was objected to by Clifton College (419). They considered it rendered the policy undeliverable.
 - Additional text to ensure proposals are consistent with design guides and codes published by community stakeholders or others, as well as the council, was sought by WeCanMake (446).

- Concern that the policy contained too many elements was raised by LiveWest (245). They advised splitting its various sections into separate policies, e.g. Urban Living, Public Art, etc.
- Criticisms that the policy wording lacked clarity were made by representors:
 - Use of 'beautiful' and 'healthy' should be removed according to Clifton College (419) as they were subjective.
 - Dominic Hogg (448) thought the policy looked like 'an afterthought'.
- A lack of reference to the role of Design Review and the council's Conservation Advisory Panel was raised as a concern by Historic England (476).
- Adoption of the Healthy Streets approach as a formal assessment of street design and transport schemes was sought by Bristol Business Improvement Districts (423).
- Encouraging development to be designed in line with its Active Design guide and principles was advocated by Sport England (485).

Policy DC1: Liveability in residential development including space standards, aspect and private outdoor space

Representations received: 15 Object: 9 Support: 6

- Support for the policy was received from Argo Real Estate Management Ltd (491), Orangestar Capital (Globe Bristol) Ltd (441), Fusion Group (396), AEW UK Investment Management (458), Gloucestershire County Cricket Club (447), LiveWest (245) and Yara Capital (426).
- Concern that the policy was not in accordance with the 'Achieving appropriate densities' section of the National Planning Policy Framework (December 2023) was raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478).
- References to the Urban Living Supplementary Planning Document (SPD):
 - removal of references to the SPD was sought by the Home Builders Federation (414), Sovereign Network Group (461), AEW UK Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management and Taylor Wimpey (478). They considered it was dated, inconsistent with national planning policy, not tested for its impact on development viability and not subject to independent examination. They also considered it underpinned requirements in the policy and thought this inappropriate.
 - a lack of clarity in the relationship between the policy and the SPD was the view of Kenneth MacArthur (5). He thought the SPD contained only recommendations whereas the policy indicated that development proposals should be required to follow the SPD.
- 'Internal space standards' section of policy text:

- Objection to the need for development to comply with the Government’s nationally described space standard was made by the Home Builders Federation (414), Taylor Wimpey, AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (478). This was on the grounds that it had not been justified, as required by national planning policy.
- ‘Aspect’ section:
 - Sovereign Network Group (461), Taylor Wimpey, AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (478) sensed an inconsistency in the way the policy sought to ‘maximise’ dual aspect and ‘avoid’ single aspect homes, with the former providing flexibility and the latter being too restrictive. They favoured instead text which only required development to optimise dual aspect homes.
 - Was too restrictive regarding single aspect homes according to ABRDN Plc (440) and Bristol Alliance Limited Partnership (442). They suggested text which set out the circumstances where these dwellings would be supported. Similarly, Dandara Living Developments Ltd (430) felt it was too negative, arguing that single aspect homes do not necessarily result in poor quality accommodation.
- ‘Private outdoor space’ section:
 - ABRDN Plc (440) and Bristol Alliance Limited Partnership (442) considered that text should be added to clearly specify that, in addition to gardens and balconies, roof terraces are a suitable means by which private amenity and play space outdoor can be provided.
 - The policy inappropriately required provision of play space irrespective of site or location circumstances / context according to Sovereign Network Group (461). Echoing this concern, Taylor Wimpey, AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (478) thought there was a lack of evidence to justify this part of the policy.
 - Recognition in the policy that there are often other planning issues that restrict the incorporation of balconies on flats, such as overlooking, was urged by McCarthy Stone (300).

Policy DC2: Tall buildings

Representations received: 27 Object: 19 Support: 8

- Historic England (476) raised concern at the absence of an evidence study which could have informed the policy and its vision / strategy for the appropriate location of tall buildings.
- Whether a suitably plan-led approach had been taken was questioned by Historic England (476). Referring to the policy text which states that proposals should be consistent with the Urban Living Supplementary Planning Document (SPD), they

pointed out that the SPD only refers to recommendations for individual proposals. They were concerned about the potential cumulative effects of individual proposals on the coherence of the cityscape without an overall vision / strategy for tall buildings.

- Opposition to the policy was received from Bristol Civic Society (285) (whose comments were supported by Bristol Conservation Advisory Panel (340), George Ferguson (415) and Knowle Neighbourhood Planning Group (372)), Kingsdown Conservation Group, Shankari Raj (3) and Kevin Chidgey (345). Concerns about tall buildings included:
 - potential impacts on the city's skyline, city centre / harbourside character and heritage assets such as the setting of conservation areas and listed buildings.
 - creation of inadequate living environments;
 - a perceived lack of public support;
 - high carbon emissions relative to lower buildings;
 - their inappropriateness given the city's topography.

Rather than tall buildings Bristol Civic Society (285) favoured encouraging mid-rise, high-density developments in the city centre. If tall buildings were to be promoted, Kevin Chidgey (345) felt they should be located only in low lying areas away from the city's historic core.

- References in the policy text to locations where tall buildings may be appropriate:
 - These were objected to by Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472). They felt there was a lack of evidence to justify the locations and considered that identifying locations was contrary to the concept of optimising density based on site and location specific considerations.
 - Bristol Civic Society (285) were concerned about the lack of clarity on locations and acceptable heights of tall buildings. Frank Bruce and Company Limited (493) also sought clarity on locations, suggesting the Lawrence Hill growth and regeneration area could be specified.
- Reference to the Urban Living Supplementary Planning Document (SPD):
 - removal of reference to the SPD was sought by the Sovereign Network Group (461), AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management and CBRE Investment Management (472). They considered it was dated, inconsistent with national planning policy, not tested for its impact on development viability and not subject to independent examination. They also considered it underpinned requirements in the policy and thought this inappropriate.

- Concerns that the policy was too restrictive were raised by Conygar Bristol Ltd (403) and Central Fishponds Ltd (405). Rather than stating that ‘tall buildings should not have a harmful impact...’, they favoured wording to the effect that the design of tall buildings should minimise and where possible avoid a harmful impact.
- Clarity on the reference in the policy text to ‘unduly dominating impacts on adjoining buildings’ was sought by Dandara Living Developments Ltd (430) who felt it was too subjective.
- Regarding the section of the policy which provides criteria for assessing harmful impact, Bristol Parks Forum (495) felt this should be strengthened to ensure the extent of the assessment area on local surroundings is made clear. They sought specific reference to a ‘harmful impact on features in the locality of the development’.
- A cap on the height of buildings was sought by Visit West - Local Visitor Economy Partnership (306) over concerns about impacts on cityscape.
- Greater detail with targets for implementation and a review process was sought by Bristol Conservation Advisory Panel (340).
- Regarding the policy’s reference to tall buildings being over 30 metres / 10 storeys, Fishponds Community Planning Group (190) were of the view that, in an area such as Fishponds where two-storey buildings predominate, buildings above approx. 21 metres / 7 storeys would be considered tall and out of scale.
- Dominic Hogg (448) considered the policy to be vague yet permissive.
- Support for the policy was received from Abrdn Plc (440), Argo Real Estate Management Ltd (491), Fusion Group (396), Orangestar Capital (Globe Bristol) Ltd (441), Bristol Alliance Limited Partnership (442), Gloucestershire County Cricket Club (447), Cubex Land Limited (453), AEW UK Investment Management (458) and Yara Capital (426).

Policy DC3: Alterations to existing buildings

Representations received: 4 Object: 2 Support: 2

- Concerns that most of the policy’s requirements were overly onerous were raised by CBRE Investment Management (471), who sought their removal and suggested alternative text.
- Greater detail with targets for the implementation and review of this policy were sought by Bristol Conservation Advisory Panel (340).
- A lack of reference in the policy alerting developers to the need for Listed Building Consent was of concern to Bristol Conservation Advisory Panel (340).

Policy DC4: Recycling and refuse provision in new development

Representations received: 2 Object: 1 Support: 1

- The policy was not compliant with meeting Government targets to recycle waste and reduce residual waste according to Dominic Hogg (448).

- Support was received from LiveWest (245).

Heritage and the historic environment

Policy CHE1: Conservation and the historic environment

Representations received: 21 Object: 16 Support: 5

- Concern that the policy did not accord with national planning policy regarding the weighing of a proposal's public benefits against any potential harm to heritage assets was raised by Conygar Bristol Ltd (403), University of the West of England (408), Legal and General (409), Dandara Living Developments Ltd (430), Watkin Jones (437), Abrdn Plc (440), Bristol Alliance Limited Partnership (442), Sovereign Network Group (461), AEW Real Estate Investment Trust, CBRE Investment Management, Centrica Combined Investment Fund c/o LaSalle Investment Management (472), Royal London Asset Management (494) and the Parochial Church Council of St Mary Redcliffe (399).
- Criteria in the policy 'Conserving heritage assets' section was considered too restrictive by Legal & General, Dandara Living Developments Ltd (430), Watkin Jones (437), Royal London Asset Management (494) and the Parochial Church Council of St Mary Redcliffe (399). This related to the requirement that all criteria should be met. It was felt this would be impractical because, should the significance of an asset beyond the control of the applicant be harmed as a result of a change in 'setting', it was unclear how a scheme would meet the policy's first two criterion.
- Regarding the policy's 'Energy efficiency retrofit, sustainable heating and renewable energy systems' section and its reference to proposals not adversely affecting the character and appearance of the heritage asset, Bristol Parks Forum (495) thought that mention should also be made of the asset's setting.
- The policy should be strengthened by including specific criteria for safeguarding historic assets, including buffer zones, height limitations and design standards for development within conservation areas according to Bristol Conservation Advisory Panel (340). Similarly, more stringent wording so that the emphasis would be on 'requiring' rather than 'expecting' was advocated by Bristol Parks Forum (495).
- Regarding the reference in para. 13.2.9 to the need for planning applications to be supported by heritage statements, Bristol Conservation Advisory Panel (340) sought additional reference to method statements as they felt these can provide details of proposed materials and techniques to inform decision making.
- A lack of reference in the policy alerting developers to the need for Listed Building Consent was of concern to Bristol Conservation Advisory Panel (340).
- Setting out within the policy a commitment and timeframe for revising Conservation Area character appraisals was sought by Bristol Conservation Advisory Panel (340).

- Including within the policy the management of changes in the setting of a conservation area was sought by John Knight (126).
- Removal from the Policies Map of the proposed Local Historic Park and Garden designation for St Matthias Park was requested by Old Market Community Association (233). They considered it was already shown as an open space in the Old Market Quarter Neighbourhood Plan under its Policy E3.

Policy AD1: Advertisements

Representations received: 19 Object: 3 Support: 16

- Objection was made by Wildstone Capital Limited (438). They considered the policy too negatively worded, disproportionate, inflexible, inconsistent with national planning policy, lacking adequate evidence and failing to consider reasonable alternatives and market signals. Revisions to the policy were advocated.
- Additional provisions which addressed wildlife impacts and the avoidance of obstructions to cycle lanes and footpaths were sought by Windmill Hill and Malago Planning Group (174) and Bristol Business Improvement Districts (423), respectively.
- Support was received from Adblock Bristol (326), Bristol Conservation Advisory Panel (340) and fourteen members of the public.

Health, wellbeing and food sustainability

Policy HW1: Pollution Control and Water Quality

Representations received: 3 Object: 2 Support: 1

- Wording which expects development to reduce diffuse water pollution through filtration and interception, including through using Sustainable Drainage Systems or other nature-based solutions, was requested by Natural England (489).
- In addition to the policy's reference to development affecting water bodies covered by the Water Framework Directive, Natural England (489) thought that impacts of water quality on protected sites and species such as Atlantic salmon, European eel, sea lamprey and brown trout should be considered, with evidence of these species being found in sites across central Bristol and surrounding waterways.
- Regarding the policy text's first sentence and its reference to unacceptable impacts, Bristol Parks Forum (495) sought the addition of green / blue infrastructure to those impacts which should be considered.

Policy HW2: Air Quality

Representations received: 5 Object: 4 Support: 1

- Concerns about the policy's lack of clarity were raised by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (347). This was in connection with the policy's references to:

- ‘development with the potential to generate significant numbers of additional journeys’. It was felt that ‘significant numbers’ should be defined, while ‘journeys’ should refer only to those made by non-active or non-sustainable transport modes; and
- ‘significant local emissions’. A definition of this term supported by appropriate evidence was sought.
- Additional policy wording to reduce car commuting was advocated by David Gray (303), while John Knight (126) thought the relevant legal limits for air quality should be set out.

Policy HW1A: Noise

Representations received: 3 Object: 3 Support: 0

- Concern that the policy did not address construction phase noise impacts was raised by Dominic Hogg (448) and Natural England (489).
- Natural England (489) were also concerned about the supporting text’s reference to planning conditions being used to require relevant assessments of noise. This was in connection with ‘Habitats sites’, i.e. those sites of international importance defined in Conservation of Habitats and Species Regulations 2017. They sought text to clarify that, for development where noise could likely affect these sites, rather than being secured by condition, a noise assessment and mitigation scheme (if necessary) would be required prior to determination of an application in order to inform the Habitats Regulations Assessment.
- Making acoustic and noise monitoring mandatory at peak operating times when plans are submitted near 24 hour economy venues and sites was advocated by NightWatch (368), who also thought that deed of easement areas should be set up around these sites.

Policy HW1B: Contaminated land

- No representations received.

Health impacts of development

Policy HW2B: Health and development

Representations received: 9 Object: 4 Support: 5

- Natural England (489) considered the policy should be expanded to identify links between health and access to nature and green space. They thought it should require development to provide high quality designed green space / infrastructure in order to reduce the causes of ill health, improve health and reduce health inequalities.
- Objection to the policy’s requirement for health impact assessments was made by Sovereign Network Group (461), Taylor Wimpey and AEW UK Real Estate Investment Trust (483) as they considered it unnecessarily burdensome on developers.

- Requiring health impact assessments to consider impacts on the health of commuters to the proposed development was requested by David Gray (303).
- Sport England (485) made reference to their 'Active Design' guidance.
- Support was received from University Hospitals Bristol and Weston NHS Foundation Trust (250), NHS Bristol, North Somerset & South Gloucestershire Integrated Care Board (468), NHS Property Services Ltd (375) and Fishponds Community Planning Group (190).

Policy HW3: Takeaways

Representations received: 1 Object: 1 Support: 0

- Objection was made by McDonalds Restaurants Ltd (334), who considered the policy's provisions were inconsistent with national planning policy, discriminatory, disproportionate, ineffective, overly restrictive, negatively worded and insufficiently justified.

Food sustainability

Policy FS1: The provision of allotments

Representations received: 23 Object: 6 Support: 17

- The policy was opposed by AEW UK Real Estate Investment Trust, Centrica Combined Investment Fund c/o LaSalle Investment Management, Taylor Wimpey (482) and Sovereign Network Group (461) who cited the following reasons:
 - On-site provision approach:
 - This was considered inappropriate given developments of 60-plus dwellings would likely be high-density urban schemes where it would be impractical to deliver plots on-site.
 - It was viewed as contrary to local and national policy requirements to make the most effective use of land.
 - Brownfield sites in Bristol will often have land contamination issues which could preclude food growing.
 - Off-site provision or financial contributions to improvements:
 - This provision was considered to not meet tests in national planning policy for seeking planning obligations.
- A lack of evidence to justify the policy and a failure to test its impact on scheme viability was cited by Anchor (346) in its objection.
- Further detail on the amount of financial contributions to be sought from development was requested by Dandara Living Developments Ltd (430).
- Objection to the policy's provision which would allow off-site provision or financial contributions was made by Lynda Tanner (298).

- Support was received from Windmill Hill and Malago Planning Group (174), Friends of Novers Hill and Crox Bottom (Western Slopes) (155) and fourteen members of the public.

Policy FS2: Provision of food growing space in new developments

Representations received: 7 Object: 5 Support: 2

- The policy was opposed by Sovereign Network Group (461), AEW UK Real Estate Investment Trust and Taylor Wimpey (483). Their concerns included:
 - Applying the policy’s provisions to small residential development schemes was considered impracticable. A threshold approach was suggested as an alternative.
 - The policy was viewed as too inflexible. It should allow for lower food growing space provision to reflect site constraints where necessary.
 - The policy should specify that on-site food growing space provision would be for residents of the development scheme, rather than having to also provide space to make up for any shortfall in provision elsewhere.
- The appropriateness of the policy for sites suitable for high density development was questioned by Frank Bruce and Company Limited (493). For these sites, they felt text should be included to allow access to local food growing locations to be a relevant factor in the assessment of any application.
- A lack of clarity in the policy wording was of concern to Anchor (346), Dandara Living Developments Ltd (430), AEW UK Real Estate Investment Trust and Taylor Wimpey (483), e.g. ‘suitable’ space, ‘appropriate size and quality’ ‘appropriately designed’ and ‘permanent or long-term occupation’.
- A failure to test the policy’s impact on scheme viability was cited by Anchor (346) in its objection.

Policy FS3: The protection of existing food growing enterprises and allotments

Representations received: 8 Object: 7 Support: 1

- The policy was too negatively worded according to Taylor Wimpey (347) and Sovereign Network Group (461). They thought it should allow residential development on allotments where other local plan policies were met and allotment loss would be suitably mitigated.
- Concern was raised about the explanatory text in paras. 14.3.28-14.3.29 which deals with impacts on local food growing enterprises and allotments and the circumstances where site operators do not wish to continue:
 - Manor Woods Valley Group (63) sought removal of para. 14.3.29 fearing it could pave the way for the loss of these enterprises.
 - Anchor (346) considered para. 14.3.29 unclear and inconsistent with para. 14.3.28 which seemed to preclude the loss of these sites.

Utilities and Minerals

Policy UM1: Telecommunications

Representations received: 1 Object: 1 Support: 0

- Within the first bullet point of the policy text, Bristol Parks Forum (495) thought the functions of the sites involved should also be referenced as a matter proposals for telecommunications equipment and installation should respect.

Policy UM2: Unstable Land

Representations received: 1 Object: 0 Support: 1

- Support was received from the Coal Authority (99).

Policy UM3: Minerals Safeguarding Areas

Representations received: 1 Object: 0 Support: 1

- Support was received from the Coal Authority (99).

Policy UM4: Sewage Treatment Works

Representations received: 1 Object: 1 Support: 0

- Greater ambition in the policy regarding the provision of wider sewerage improvements was advocated by the Environment Agency (465). They felt it should explore how new development can contribute to solving current problems such as harm to watercourses from combined stormwater overflows and emergency overflows at pumping stations.

Development allocations

Policy DA1: Proposed development allocations

Representations received: 35 Object: 33 Support: 2

- Objection to this policy on the grounds that it allocated insufficient sites for new housing development was made by the Home Builders Federation (414). They also thought the allocations needed to consider new biodiversity net gain stipulations in relation to impacts on viability and the other requirements sought in the 'development considerations' sections of each allocation.
- Clarification on whether the proposed allocations had passed a strategic-level sequential test was sought by the Environment Agency (465).
- The policy was considered unsound by Historic England (476) without evidence that an assessment had been undertaken demonstrating an appropriate consideration of the potential impacts of the proposed allocations on the historic environment / heritage assets. Similarly, a lack of detail regarding how historic assets within and adjacent to the allocation sites would be protected was raised by Bristol Conservation Advisory Panel (340).
- Specifying the opportunities for the enhancement of green infrastructure in each of the proposed allocations was requested by Bristol Urban Greening (374).

- The following sites were promoted as additional development allocations:
 - 32-36 College House, College Green for purpose built student accommodation (representation by Empiric Student Property (459))
 - 64-68 & 78 Feeder Road, St Philip's Marsh for residential-led, mixed-use development (representation by Yara Capital (426))
 - Brislington Meadows, land at Broom Hill for residential development (representation by Homes England (231))
 - Bristol Zoo Gardens, Clifton for residential-led development (representation by Bristol, Clifton and West of England Zoological Society (418))
 - Broadwalk shopping centre (representation by Knowle Neighbourhood Planning Group (372))
 - Clifton Down Shopping Centre, Clifton Down for a residential-led mixed-uses (representation by Sovereign Network Group (461))
 - County Ground, Bishopston for residential-led development (representation by Gloucestershire County Cricket Club (447))
 - Elm Tree Farm, Stapleton for residential-led development (representation by NHS Property Services Ltd (375))
 - Land adjacent to Woodgrove Road, Henbury for residential development (representation by Stride Brothers Ltd (21))
 - Land adjoining Ponderosa, Bridgwater Road, Bedminster Down for residential development (representation by Chapel Hill Homes (433))
 - Land at 73 Netham Road, Redfield / Barton Hill for residential development (representation by Cyril Dark and Sons Ltd (434))
 - Land at 513 Stockwood Road, Brislington for residential development (representation by Industrial Gas Services SW (242))
 - Land at Castle Court ('Bristol Street Motors site'), Arno's Vale for residential-led mixed-use development (representation by Williams Automobiles Limited (157))
 - Land at Castle Court ('City Motors site'), Arno's Vale for residential-led mixed-use development (representation by Sovereign Network Group (461))
 - Land at Golden Hill, Horfield for residential and leisure mixed-uses (representation by Bristol Grammar School (422))
 - Land at Queens Parade /York Place, adj. Brandon Hill, city centre for residential-led mixed-uses (representation by Snap Investments Ltd (444))
 - Land at Yew Tree Farm, Bedminster Down for residential development (representation by Redrow Homes Ltd (369))

- Land north of the A4 Bath Road, Brislington for residential and / or older persons housing development (representation by Claverton Healthcare Ltd (206))
- Land off Tramway Road, Brislington for residential development (representation by Sovereign Network Group (461))
- Land to the South of Ironmould Lane, Brislington for residential development (representation by Barrs Court Holdings Ltd (481))
- Logos House, Wade Street, St Jude's for residential or student accommodation (representation by Salvation Army (402))
- Maggs House, 78 Queens Road, Clifton for purpose built student accommodation (representation by Schroders UK Real Estate Fund (460))
- St John Ambulance site, Raleigh Road, Bedminster for residential development (representation by St John Ambulance (401))
- South Liberty Lane / Brook Gate, Ashton Vale for mixed-use development (representation by Bailey of Bristol (129)).
- The potential loss of sites proposed for allocation which contained important green space was of concern to CPRE Avon and Bristol (492). They considered that, if the housing requirement figure was adjusted downwards, these valuable areas should be removed from the development allocations policy.
- Broadwalk shopping centre should be identified as a site allocation according to Knowle Neighbourhood Planning Group (372), although a land use was not specified.
- A failure to allocate 24-hour economy venues and sites (including festival sites) was objected to by NightWatch (368).

BDA0103 - Land at Cheltenham Road / Bath Buildings, Montpelier

- No representations received.

BDA0105 - Land to the rear of 64-68 Stokes Croft, St Paul's

- No representations received.

BDA0302 - Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road

Representations received: 2 Object: 2 Support: 0

- Amending the allocation boundary to match that of the related planning permission (ref. 21/03165/F) was sought by Esteban Investments Ltd (420).
- Reference to maintaining an 8 metre buffer to Old Colliter's Brook was objected to by Esteban Investments Ltd (420) who preferred reference to a 'suitable' buffer.
- The Environment Agency (465) considered that reference should be made to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate.

BDA0304 - 1-25 Bedminster Down Road

- No representations received.

BDA0305 - 233-237 West Street, Bedminster

- No representations received.

BDA0401 - Land at Gloucester Road /Merton Road, Horfield

- No representations received.

BDA0601 - Land at Latimer Close

Representations received: 1 Object: 1 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BDA0702 - Land at Marmalade Lane (south)

Representations received: 1 Object: 1 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BDA0703 - Land at Marmalade Lane (north)

- No representations received.

BDA0801 - The Grove Car Park, The Grove and Prince Street, Harbourside

Representations received: 3 Object: 3 Support: 0

- Detailed amendments to the proposed 'Development considerations' relating to design matters were sought by Bristol Business Improvement Districts (423).
- References to ensure development does not obscure the Mud Dock building's frontage were requested by Visit West - Local Visitor Economy Partnership (306) as they considered its terrace an important part of Bristol's visitor experience.
- Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was advocated by the Environment Agency (465).

BDA0802 - Redcliffe Way

Representations received: 2 Object: 2 Support: 0

- References to creating a high quality public realm and play facilities for residents, visitors and local office workers to enjoy was suggested by Bristol Business Improvement Districts (423).
- Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was sought by the Environment Agency (465).

BDA0901 - 2-16 Clifton Down Road

- No representations received.

BDA1001 - Land west of Hampton Lane, Clifton Down

- No representations received.

BDA1002 - Land at Whiteladies Gate, Clifton Down

Representations received: 1 Object: 1 Support: 0

- Due to the presence of the Northern Storm Water Interceptor, the Environment Agency (465) sought reference to development being set back from the culvert where possible, along with avoidance of extra loading on the culvert.

BDA1003 - Land Adjacent Alma Vale Road and Alma Court

Representations received: 1 Object: 0 Support: 1

- Support was received from landowner, Sovereign Network Group (461).

BDA1004 - Barley House, Oakfield Grove

- No representations received.

BDA1101 - Land at Gibson Road

- No representations received.

BDA1102 - Land at Sydenham Lane, Cotham

- No representations received.

BDA1201 - 16-20 Fishponds Road, Easton

- No representations received.

BDA1301 - Stapleton Cricket Club

Representations received: 20 Object: 3 Support: 17

- Support for the allocation was received from Stapleton Cricket Club (82) and 16 members of the public.
- Clarification was sought from Historic England (476) on how the council had considered the contribution the cricket ground makes to the character and appearance of the Stapleton and Frome Valley Conservation Area and how its redevelopment would meet the requirement of preserving or enhancing the conservation area.
- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.
- Sport England (485) stated that they would be very concerned if any existing sport and recreation land and buildings would be affected by this allocation without adequate replacement prior to the loss of the existing facility.

BDA1302 - Land south of Rose Green Close, Eastville

Representations received: 6 Object: 6 Support: 0

- Objection to this allocation was made by Christina Gyles (205), Harriet Parke (228), Mary Stevens (292) and Martyn Cordey (359) with the reasons including

impacts on open space, trees, hedges, recreation, wildlife habitats and landscape and cultural value.

- Opposition on the grounds that the allocation could limit the growth of the Rose Green Centre and the football and cricket clubs that use it was made by Theron Gordon (361).
- Sport England (485) stated that they would be very concerned if any existing sport and recreation land and buildings would be affected by this allocation without adequate replacement prior to the loss of the existing facility.

BDA1303 - Land at Hendys Yard, Lower Grove Road

- No representations received.

BDA1304 - Land to the rear of Rose Green Road, Eastville

- No representations received.

BDA1305 - 525 Stapleton Road, Fishponds

- No representations received.

BDA1401 - Previously developed land at Hartcliffe Way, Bedminster

Representations received: 1 Object: 1 Support: 0

- Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.

BDA1402 - Previously developed land to the west of Redford House, Nover's Hill

Representations received: 3 Object: 3 Support: 0

- Objection to this allocation was made by James Drozd (351) on the grounds that the existing industrial units could potentially have to be relocated to a nearby site with wildlife value.
- More stringent wording in the allocation's 'development principles' to ensure protection of the adjoining site of nature conservation interest was sought by Tony Pitt (317).
- Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.

BDA1501 - Land at College Road, Fishponds

Representations received: 96 Object: 96 Support: 0

- Fishponds Community Planning Group (190) and ninety-five members of the public objected to the allocation. The reasons cited included negative impacts on open / green space important for mental health, recreation, visual amenity and nature conservation. Concerns were also raised about potential adverse effects on air quality, noise, traffic congestion, car parking and already pressurised local community services and facilities.

BDA1601 - Land to the rear of 96 Church Road / Orchard Drive, Bishopsworth

- No representations received.

BDA1702 - 14 Wyck Beck Road, Brentry

- No representations received.

BDA1901 - Land at the corner of Lodge Causeway / Berkeley Road, Fishponds

- No representations received.

BDA2001 - 3 Kelston Road, Horfield

- No representations received.

BDA2002 - 272-276 and 290-298 Southmead Road

- No representations received.

BDA2101 - 94-96 & 119 Cumberland Road, Spike Island

Representations received: 1 Object: 1 Support: 0

- Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was sought by the Environment Agency (465).

BDA2102 - Maritime Heritage Centre Public Car Park, Gas Ferry Road

Representations received: 5 Object: 5 Support: 0

- Objection to this allocation was made by Richard Grigsby (336), Keith Pavey (93), Sylvia Heyhoe (94) and John Dalby (54) on the grounds of the potential loss of an open space valuable for local character, mature trees and wildlife.
- Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was sought by the Environment Agency (465).

BDA2301 - Land to the south of Warwick Road / Oxford Place, Easton

- No representations received.

BDA2302 - Former Barton Hill Nursery School, Queen Ann Road, St Philips

- No representations received.

BDA2401 - Bridge Farm, Land at South Hayes, Eastville

Representations received: 1 Object: 1 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BDA2501 - Land south of Zetland Road, Redland

- No representations received.

BDA2502 - Land at Cossins Road, Redland

- No representations received.

BDA2601 - Land at Two Mile Hill Road / Charlton Road, St George

- No representations received.

BDA2602 - 81-83 Two Mile Hill Road, St George

Representations received: 1 Object: 1 Support: 0

- Amending the land use of the proposed allocation to also specify housing for older people was requested by McCarthy Stone (300), who also sought deletion of the reference to the provision of compatible workspace.

BDA2603 - Land at Two Mile Hill Road / Waters Road, St George

- No representations received.

BDA2605 - Land at Broad Road / Lodge Road, St George

- No representations received.

BDA2702 - Land at corner of Bryants Hill and Furber Road, St George

- No representations received.

BDA2703 - Land at Nags Head Hill, St George

- No representations received.

BDA2801 - Land to the south of Blackswarth Road, Avonview

Representations received: 2 Object: 2 Support: 0

- The requirement for a mix of uses was objected to by Woodstock Homes Ltd (393) who favoured a solely residential development allocation. They also sought deletion of the requirement for an eight metre buffer to the River Avon and thought reference to the estimated housing capacity should be increased to 85 homes.
- The Environment Agency (465) identified this allocation as being located next to the River Avon, in flood zone 3, and in an area where Bristol Avon Flood Strategy flood defences will be required. It thought flood risk assessments for this site would need to meet these requirements and that reference should be made to development complying with Policy FR2 'Bristol Avon Flood Strategy'.

BDA2802 - Part of Soaphouse Industrial Estate, Howard Street

- No representations received.

BDA2803 - 222-232 Church Road, St George

- No representations received.

BDA2901 - Land at Lanercost Road

- No representations received.

BDA2902 - Works at Felstead Road

Representations received: 1 Object: 1 Support: 0

- Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zones 2 and 3.

BDA3002 - 1-7 Smyth Road, Southville

- No representations received.

BDA3101 - Greville building, Lacey Road, Stockwood

- No representations received.

BDA3201 - Land at Sanctuary Gardens, Sneyd Park

Representations received: 1 Object: 1 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BDA3301 - Former St Ursula's High School, Brecon Road

- No representations received.

BDA3401 - 122 Bath Road, Totterdown

- No representations received.

BSA0103 - Land to the west and south-west of Deering Close, Lawrence Weston

Representations received: 2 Object: 2 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) and Natural England (489) on grounds of potential impacts on habitats for nature, with the latter representor considering the site contained broadleaf woodland, a priority habitat. They felt the proposal was inconsistent with national policy to protect and enhance ecological networks and priority habitats.

BSA0111 - Land off Ermine Way, Shirehampton

Representations received: 1 Object: 1 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BSA0212 - 19-21 Pen Park Road, Southmead

- No representations received.

BSA0302 - Coombe House Elderly Persons' Home, Westbury-on-Trym

- No representations received.

BSA0404 - BT Depot, Filton Road, Horfield

- No representations received.

BSA0502 - Glenside Campus, Blackberry Hill, Fishponds

Representations received: 1 Object: 1 Support: 0

- While supportive of the allocation in principle, the University of the West of England (408) sought an extension to its boundary to allow for a comprehensive approach to the site's masterplanning.

BSA0513 - Garage site, Woodland Way, Chester Park / Hillfields

Representations received: 1 Object: 1 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BSA0906 - Car Sales site at 62-74 Bell Hill Road, St George

- No representations received.

BSA0907 - 47 - 49 Summerhill Road, St George

- No representations received.

BSA1011 - Site adjacent to Holy Cross Church, Dean Lane, Bedminster

Representations received: 5 Object: 5 Support: 0

- Concerns were expressed by Patrick Walker (127), Angela Ferrer Lopez (353), Jonathon Lines (268) and Angela Serjeant (350) that the 'development considerations' for this allocation did not adequately address potential impacts on the adjoining school concerning access, traffic impacts and design matters. An allocation for educational or mixed-uses was preferred.
- Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.

BSA1101 - Bath Road Open Space (west of Totterdown Bridge), Totterdown

Representations received: 5 Object: 5 Support: 0

- Amendment of the site's estimated housing capacity from 40 to up to 400 homes was sought by Change Real Estate and Abri (425) to reflect site context and planning policies on making the most efficient use of land. Similarly, Tom Gabriel (141) considered the stated capacity figure was too low.
- Objection to this allocation was made by Martyn Cordey (359) and Natural England (489) on the grounds of potential impacts on habitats for nature. The latter representor considered it could significantly harm the River Avon SNCI and compromise the maintenance and enhancement of an important ecological corridor along the River Avon close to the city centre.
- The Environment Agency (465) sought references to the need for development to be set back from the watercourse, supported by a flood risk assessment and consider the requirements of the Bristol Avon Flood Strategy.

BSA1103 - Red Lion Works, Greenleaze Road / Wells Road, Knowle Park

- No representations received.

BSA1108A - Previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane

- No representations received.

BSA1109 - Land adjoining Hartcliffe Way and Hengrove Way, Inn's Court

Representations received: 5 Object: 5 Support: 0

- Objection to this allocation was made by Martyn Cordey (359) and Natural England (489) on grounds of potential impacts on habitats for nature. The latter representor considered the site contained priority habitats and was therefore inconsistent with national policy to protect and enhance ecological networks and priority habitats. They also felt the site to be in a location deficient in access to greenspace and so opposed the allocation as it would further reduce such access.
- Knowle West Regeneration Residents Planning Group / Knowle West Future (373), Inns Court Residents Group (57) and Tony Pitt (317) raised concern about the appropriateness of the allocation's boundary and estimated housing capacity given the planning permission for the 'Youth Zone' facility on this site. Ensuring suitable green space was provided for recreation and wildlife in any revised allocation boundary was also advocated.

BSA1115 - Former Florence Brown school, west of Leinster Avenue

Representations received: 1 Object: 1 Support: 0

- Removing this allocation or amending it to reflect the recent planning permission for housing (ref. 20/03297/F) was advised by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).

BSA1116 - Open spaces either side of Inns Court Drive

Representations received: 5 Object: 5 Support: 0

- Objection to this allocation on grounds of potential impacts on habitats for nature was made by Inns Court Residents Group (57), Martyn Cordey (359) and Natural England (489). The latter representor considered the site contained priority habitats and was therefore inconsistent with national policy to protect and enhance ecological networks and priority habitats. They also felt the site to be in a location deficient in access to greenspace and so opposed the allocation as it would further reduce such access.
- Inns Court Residents Group (57) and Jiorgia Toye (243) also raised concerns about the importance of the sites' value for recreation, tranquility and openness.

BSA1118 - Broad Plain House and associated land, Broadbury Road

Representations received: 2 Object: 2 Support: 0

- Removing this allocation to reflect construction being underway on a residential development scheme (ref. 21/00816/F) was advised by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).
- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BSA1120 - Land and buildings between 2 to 20 Filwood Broadway

Representations received: 2 Object: 2 Support: 0

- Amendments to this allocation to reflect the planning permission recently granted for residential development (ref. 22/03536/FB) were advised by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).
- Objection to this allocation was made by Martyn Cordey (359) on grounds of potential impacts on habitats for nature.

BSA1122 - Sports court and former swimming pool site on the north-east corner of the Filwood Broadway and Creswicke Road junction

Representations received: 1 Object: 1 Support: 0

- Adding green space and an energy centre to the land uses proposed for this allocation was advocated by Knowle West Regeneration Residents Planning Group / Knowle West Future (373).

BSA1123 - Filwood Library and adjoining land, Filwood Broadway

- No representations received.

BSA1207 - 493-499 Bath Road, Kensington Park, nr Arno's Vale

Representations received: 1 Object: 0 Support: 1

- Support was received from landowner, Sovereign Network Group (461).

BSA1305 - Land to the north-west of Vale Lane, Bedminster Down

Representations received: 3 Object: 3 Support: 0

- Objection to this allocation was made by James Drozd (351), Martyn Cordey (359) and Manor Woods Valley Group (63) on grounds of potential impacts on nature conservation interests.

BSA1402 - Former New Fosseway School, Hengrove

Representations received: 1 Object: 1 Support: 0

- Sport England (485) stated that they would be very concerned if any existing sport and recreation land and buildings would be affected by this allocation without adequate replacement prior to the loss of the existing facility.

SA101 - Wapping Wharf, Wapping Road

Representations received: 1 Object: 1 Support: 0

- More stringent and detailed wording relating to the flood risk assessment reference was requested by the Environment Agency (465).

SA102 - Waterfront Site, Millennium Square

Representations received: 1 Object: 1 Support: 0

- Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was sought by the Environment Agency (465).

SA202 - Land to the west of Lodge Street

Representations received: 1 Object: 1 Support: 0

- Text referring to the potential for significant below ground archaeology and the implications for development proposals was recommended by Historic England (476).

SA301 - 55-59 St Michael's Hill

- No representations received.

SA403 - Old Seaman's Chapel, Royal Oak Avenue

Representations received: 1 Object: 1 Support: 0

- Specific reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate was sought by the Environment Agency (465).

SA404 - Gap site, 16 Narrow Quay

Representations received: 2 Object: 1 Support: 1

- Support was received from the landowner, Samuel Smith Old Brewery (Tadcaster) (454).
- Reference to development not causing extra loading of Mylnes Culvert was requested by the Environment Agency (465).

SA501 - Lakota Nightclub / Former Coroner's Court, Upper York Street / Backfields

- No representations received.

SA506 - 97-101 Stokes Croft

- No representations received.

SA507 - 27-33 Jamaica Street

- No representations received.

SA509 - Land at Wilder Street / Argyle Road

- No representations received.

SA510 - Land at Dove Lane / Ervine Terrace / Wilson Place / Cheapside

- No representations received.

SA511 - F C Hammonds 13-17 Dove Lane, St Pauls

Representations received: 1 Object: 1 Support: 0

- Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.

SA512 - 109 - 119 Newfoundland Road

Representations received: 1 Object: 1 Support: 0

- Reference to the need for development proposals to be supported by a flood risk assessment was advised by the Environment Agency (465) as they identified the site as being in flood zone 2.

SA608 - Land and buildings at Victoria Street / Temple Street

Representations received: 1 Object: 1 Support: 0

- More stringent and detailed wording relating to flood risk assessment requirements was requested by the Environment Agency (465), along with reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate.

SA610 - Railway cutting, Lower Guinea Street

Representations received: 1 Object: 1 Support: 0

- More stringent and detailed wording relating to flood risk assessment requirements was requested by the Environment Agency (465), along with reference to development complying with Policy FR2 'Bristol Avon Flood Strategy' where appropriate.

SA612 - The Bell and adjoining buildings, Prewett Street

Representations received: 1 Object: 0 Support: 0

- Concern was raised by David Austin (122) at the lack of progress redeveloping this site, although no objection was made to the allocation.

Omissions

Summary of main omissions raised by representors

Omitted policies

- A policy supporting university-related development at established campuses outside of the city centre was sought by the University of the West of England (408).
- A policy on adaptive reuse of historic buildings, promoting their integration into new development projects was advocated by Bristol Conservation Advisory Panel (340).

Other omissions

- The absence of a monitoring framework which sets out the targets for housing was raised by the Home Builders Federation (414).
- A lack of a housing trajectory was objected to by the Home Builders Federation (414).
- A lack of reference to (and availability of) a statement of common ground with the other West of England local planning authorities was raised by representors from the housing development industry / landowners and Kevin Chidgey (345).

Other comments

- Regarding 'Appendix C – Bristol heat networks', Natural England (489) noted that 'Figure C3 Indicative Strategic Heat Main route' shows areas of the Strategic Heat Main route would be within 500m of the Severn Estuary SPA/SAC/Ramsar/SSSI and could therefore result in disturbance to SPA/Ramsar/SSSI-protected birds.

Appendix:
Local Plan
Publication Version (November 2023)
Regulation 19
Statement of Consultation



Bristol Local Plan Publication Version (November 2023) **Statement of Consultation**

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Contents

1. Introduction.....	5
Purpose of document	5
Overview of Local Plan preparation process	5
2. Who was consulted?	6
3. Consultation methods used	6
4. Summary of main issues raised and how they were addressed	8
Stage 1 – Local Plan Review: Consultation (2018).....	8
Vision – how will the city develop?	8
Strategy – meeting housing needs through urban living	9
Delivering new homes through urban living	28
Economy and employment land.....	39
Health and well being.....	43
Resilience.....	48
Local plan policies proposed to be retained	51
Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation (2019)	56
Vision: Building a better Bristol	56
Development strategy	57
Infrastructure and Developer Contributions.....	90
Urban Living: Making the best use of the city’s land	92
Housing.....	96
Economy	112
Shopping, Services and the Evening Economy	119
Green Infrastructure.....	121
New Protection for Open Space – Consultation.....	128
Transport	133
Community facilities.....	139
Climate Change and Sustainability	140
Design and Conservation.....	141
Health and Wellbeing	146
Utilities and Minerals	150
Draft Development Allocations	150
Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further consultation (2022)	169
Vision: Building a better Bristol.....	169

Housing need and requirement	173
Affordable housing	177
Net zero and climate	179
Biodiversity and nature recovery	186
Food sustainability.....	196
Shopping, Services and the Evening Economy	199
Design	207
Development locations and allocations	217
Appendix 1 – Local Plan Consultation Database	225
Appendix 2 – Consultation methods used	226
Stage 1 – Local Plan Review: Consultation (2018).....	226
Consultation methods used:	226
Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation (2019)	228
Consultation methods used:	228
Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further consultation (2022)	230
Consultation methods used:	230

1. Introduction

Purpose of document

This document sets out how Bristol City Council has sought participation from communities and stakeholders during preparation of its Local Plan. In doing so it demonstrates how the council has complied with the requirements of its Statement of Community Involvement (2015) and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Alongside the Local Plan Publication Version, Regulation 19 requires the council to publish a statement setting out the following:

- a) which bodies and persons were invited to make representations under Regulation 18;
- b) how those bodies and persons were invited to make such representations;
- c) a summary of the main issues raised by those representations; and
- d) how the issues have been addressed in the Local Plan.

Overview of Local Plan preparation process

There were three main stages in the preparation of the Local Plan:

Stage 1 – Local Plan Review: Consultation document (2018)

Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation document (2019)

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further Consultation document (2022).

Stage 1 – Local Plan Review: Consultation document (2018)

In February 2018 the council published the ‘Bristol Local Plan Review – Consultation’ document for comment.

As the Core Strategy had been adopted in 2011, one of the main aims of the 2018 document was to seek views on how the city’s strategic housing needs could be met over the new plan period to 2036.

These needs had been identified in the West of England Joint Spatial Plan. Prepared by Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire Councils, the Joint Spatial Plan included a requirement of 33,500 new and affordable homes to be delivered in Bristol by 2036.

The other main aim of the 2018 document was to seek comment on the updating of a number of existing Local Plan policies. This updating was necessary to reflect changes to national planning policy and local issues since the adoption of the Core Strategy. Initial proposals for the approach to the management and provision of specialist forms of housing, climate change, health and wellbeing and open space protection were set out for comment.

Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation document (2019)

In March 2019 the council published the ‘Bristol Local Plan Review – Draft Policies and Development Allocations – Consultation’ document for comment.

This document had been informed by responses to the 2018 consultation and was published in the context of the Joint Spatial Plan, which had reached the examination stage.

The 2019 consultation document contained draft policies relating to the proposed development strategy, infrastructure contributions, urban living, housing, economy, green infrastructure, transport, climate change, design and conservation, and health and well-being. It was supported by an Annex containing proposed allocations for new homes, industrial or mixed-use development. A document setting out sites proposed for Local Green Space and Reserved Open Space protection was also published.

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further Consultation document (2022)

In November 2022 the council published the ‘Bristol Local Plan Review – Draft Policies and Development Allocations – Further consultation’ document for comment.

One of the main aims of the document was to set out the strategic planning context for the Local Plan. This followed the Joint Spatial Plan’s withdrawal from examination in April 2020 and work being discontinued on the West of England Combined Authority’s Spatial Development Strategy.

Due to the passage of time and changing strategic context it was also necessary to further update existing Local Plan policies. Comment was sought on draft policies relating to housing provision, affordable housing, net zero and climate change, biodiversity and nature recovery, food sustainability, shopping, centres and the evening economy, design and development locations and allocations.

2. Who was consulted?

Members of the Local Plan Consultation Database were kept informed of progress and opportunities for involvement throughout the preparation of the Local Plan. The database contains approximately 2,500 residents, businesses, groups, organisations, statutory bodies and other parties who have expressed an interest in being involved in preparing the Local Plan. More information on the membership of the database is provided in Appendix 1.

3. Consultation methods used

A range of consultation methods was used throughout the plan’s preparation in accordance with the council’s Statement of Community Involvement to ensure on-going, proportionate and effective engagement. These included:

- Consultation documents to seek views on draft proposals and policies;
- Council website, for example:
 - Awareness-raising articles published on its Newsroom pages;
 - Planning Policy pages containing consultation documents and information on how comments could be made;
 - The 'Ask Bristol' online consultation and engagement hub, where consultations were publicised and comments sought via questionnaires / surveys.
- Discussion events, e.g. workshops / round-table discussions;
- Drop-in events / exhibitions in accessible locations;
- Emails and letters to the Local Plan Consultation Database, for example with progress updates on Local Plan preparation and how to get involved with consultations;
- Meetings to discuss and gain feedback on emerging proposals and policies. These included:
 - liaison meetings with Bristol Neighbourhood Planning Network member groups, the Bristol Civic Society and the Bristol Property Agents Association;
 - meetings with statutory bodies and amenity / local community groups to discuss specific issues;
 - on-going meetings with neighbouring councils;
 - regular meetings with the cross-party Local Plan Working Group of BCC Councillors.
- Press releases and launches to publicise Local Plan consultations;
- Questionnaires / surveys produced for Local Plan consultations placed on the Ask Bristol online consultation and engagement hub;
- Social media, for example postings about Local Plan consultations on Ask Bristol's Twitter account;
- An on-going Call for Sites exercise in which developers, landowners, businesses and other organisations were invited to put forward potential sites for new homes and/or economic development within Bristol. These informed the selection of development allocations included in the Local Plan Publication Version.

More detail on the methods used at each stage in preparing the Local Plan is provided in Appendix 2.

4. Summary of main issues raised and how they were addressed

This section sets out the main issues that were raised during the preparation of the Local Plan and how they were addressed.

Stage 1 – Local Plan Review: Consultation (2018)

In February 2018 the council published the ‘Bristol Local Plan Review – Consultation’ document for comment. A total of 436 responses were received. The main issues raised and how they were addressed in the Local Plan are set out in the tables below.

Vision – how will the city develop?

Table 1 - main issues raised on Vision and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Too vague. • Too city centre focused. • Specific reference to / more emphasis needed on: sustainability and climate change; historic environment; affordable housing; natural environment; protecting tree cover; mixed and balanced communities; children and a child-friendly city; resources and waste; build to rent housing; Avonmouth and Port of Bristol; stronger commitment to delivering housing. • Does not fully align with Joint Spatial Plan’s vision to close gap between disadvantaged and other communities by 2036. 	<p>The Local Plan Publication Version contains a positive vision for the future development of Bristol looking ahead to 2050.</p> <p>It addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met.</p> <p>The vision is supported by a set of aims and objectives. These provide more detail on how the local plan will address the issues identified in the vision. References are provided to chapters in the local plan which contain policies with a particular focus on responding to the aims and objectives.</p> <p>The key matters raised in the 2018, 2019 and 2022 consultations have informed the vision, objectives, aims and / or policies of the Local Plan Publication Version.</p>

Strategy – meeting housing needs through urban living

Comments on general approach to proposed strategy

Table 2 - main issues raised on general approach to proposed strategy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Housing target: <ul style="list-style-type: none"> ○ Concern target not deliverable given current housing completion rates, plus is an underestimate. ○ More detail needed on distribution and deliverability of housing in sites across Bristol. • Greater emphasis needed on: <ul style="list-style-type: none"> ○ Other housing types such as affordable, temporary and child-friendly housing. ○ Infrastructure required to support housing delivery. ○ Protecting the environment. ○ Employment land needed to accompany housing delivery. • Historic England endorsed Urban Living approach 	<ul style="list-style-type: none"> • Housing target: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy H1 ‘Delivery of new homes – Bristol’s housing requirement’ contains an appropriate housing target for the plan period. ○ Provided in Local Plan Publication Version’s ‘Development Strategy’ chapter and supporting site allocations annex. • Requests for greater emphasis: <ul style="list-style-type: none"> ○ Addressed in Local Plan Publication Version Policy H4 ‘Housing type and mix’. ○ Addressed in various Local Plan Publication Version policies including IDC1 ‘Development contributions and CIL’; BG1 ‘Green Infrastructure and biodiversity in new development’; Policy GI A ‘Open Space for Recreation’; T2 ‘Transport infrastructure improvements’; and CF1 ‘Provision of community facilities’. ○ Covered by policies in Local Plan Publication Version chapter on ‘Biodiversity and Green Infrastructure’, amongst others. ○ Addressed in Local Plan Publication Version Policy E2 ‘Economic development land strategy’. • Urban living approach supported by published Urban Potential assessment.

Main issues raised	How they were addressed
<p>provided potential risks to city's historic townscape and setting of heritage assets are addressed in relation to development capacity assumptions.</p> <ul style="list-style-type: none"> Natural England sought more ambition for natural environment, e.g. greater prominence to development of West of England Green Infrastructure Plan, plus commitments to enhancing Green Infrastructure network and achieving net gains in biodiversity. 	<ul style="list-style-type: none"> Addressed by policies in Local Plan Publication Version chapter on 'Biodiversity and Green Infrastructure', amongst others.

Comments on transport strategy

Table 3 - main issues raised on transport strategy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Insufficient strategic transport plan and proposals to support planned growth. Lack of reference to transport impacts and requirements resulting from urban living approach. More emphasis needed on active travel, including strategic pedestrian and cycle network proposals. Child-friendly streets and promotion of electric vehicles also advocated. 	<ul style="list-style-type: none"> Addressed by Local Plan Publication Version Policy T2 'Transport infrastructure improvements'. Urban living approach supported by published Urban Potential assessment. Transport impacts of proposals covered by Local Plan Publication Version Policy T3A 'Transport development management'. Provided in Local Plan Publication Version policies T1 'Development and transport policies' and T6 'Active travel routes'.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Cross-references sought to relevant plans: Bristol Transport Strategy, City Centre Framework, West of England Local Cycling and Walking Infrastructure Plan and BCC’s Transport Development Management Guide. 	<ul style="list-style-type: none"> • Appropriate cross-references made in various Local Plan Publication Version’s ‘Transport’ chapter policies.

Central Bristol

Proposal CDS 1: Bristol City Centre

Table 4 - main issues raised on Proposal CDS 1: Bristol City Centre and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Need for flexible policies to enable resilience, diversity and balance in uses. • Requirement for supporting transport infrastructure. • Concerns about how a diverse housing stock will be delivered to balance existing proliferation of flats and student housing. • More detail on specific housing allocations and targets. • Tall Buildings and Urban Living approach: concern about impact on heritage assets and lack of clarity on type of housing to be delivered. Alternative mid- 	<ul style="list-style-type: none"> • Diversity and mix of uses referred to in Local Plan Publication Version Policy DS1 ‘Bristol City Centre’. • Policy DS1 ‘Bristol City Centre’ refers to improved transport systems. Also addressed by Publication Version Policy T2 ‘Transport infrastructure improvements’. • Appropriate mix referenced in Policy DS1 ‘Bristol City Centre’. Also covered by Publication Version H4 ‘Housing type and mix’. • Local Plan Publication Version contains supporting development allocations annex. Indicative housing capacity provided in supporting text to Policy DS1 ‘Bristol City Centre’. Target set out in Policy H1 ‘Delivery of new homes – Bristol’s housing requirement’. • Policy DS1 ‘Bristol City Centre’ refers to development conserving heritage assets and advocates a mix of housing types. Issues also covered by Policy DC2 ‘Tall buildings’ which sets out criteria to ensure important planning considerations are appropriately

Main issues raised	How they were addressed
<p>rise approach considered more appropriate.</p> <ul style="list-style-type: none"> • More references to walking and pedestrian facilities and proposals needed. 	<p>considered. Policy H4 'Housing type and mix' sets out overall approach to securing appropriate mix of housing types.</p> <ul style="list-style-type: none"> • Addressed with specific references made in Policy DS1 'Bristol City Centre' to new and improved walking routes. Also addressed in Policy T2 'Transport infrastructure improvements' which identifies planned enhancements to transport infrastructure.

Proposal CDS 2: Extended Bristol Temple Quarter Enterprise Zone

Table 5 - main issues raised on Proposal CDS 2: Extended Bristol Temple Quarter Enterprise Zone and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Appropriateness of tall buildings. • Potential operational impacts on existing noise-generating businesses from new uses. • Need for flexibility in proposed land uses, which may be needed to respond to market circumstances. • Historic England sought greater clarity on proposals to 'transform' Temple Meads station to ensure its Grade 1 listed status is reflected. They also saw the Enterprise Zone extension as an opportunity to enhance important historic sites, which could be highlighted in the proposal. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' makes clear that tall buildings may be appropriate and cross refers to Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered. • Covered by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses. • Addressed in Publication Version Policy DS2 'Bristol Temple Quarter' with reference to the development of a wide range of uses. • This has been clarified for Local Plan Publication Version Policy DS2 'Bristol Temple Quarter' with reference to development enhancing this heritage asset. Designation of Silverthorne Lane Conservation Area in 2021 also relevant to this issue.

Proposal CDS 3: St. Philip’s Marsh

Table 6 - main issues raised on Proposal CDS 3: St Philip’s Marsh and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Operational impacts on existing noise-generating businesses from new uses, leading to their eventual loss. • Need to retain a diverse employment base including light industrial in sustainable locations. • More detail needed on proposals for: <ul style="list-style-type: none"> ○ River Avon flood and water management. ○ Greenways and sustainable travel. • Wholesale and Fruit Market should be recognised and safeguarded as important part of city’s food infrastructure. • Avon Meads Retail Park should be included as has redevelopment potential. • Environment Agency sought reassurance through policy revisions that there would be no adverse impacts on third party interests resulting 	<ul style="list-style-type: none"> • Covered by Local Plan Publication Version policies HW1 ‘Pollution control and water quality’ and HW1A ‘Noise’. These will ensure noise-sensitive development proposals consider nearby existing uses. • Local Plan Publication Version Policy E2 ‘Economic development land strategy’ sets out city-wide approach to creating a diverse employment land supply. Policy DS3 ‘St Philip’s Marsh’ provides more detail on the types of workspace expected to be delivered in different parts of this location. • More detail sought: <ul style="list-style-type: none"> ○ Addressed in Local Plan Publication Version policies FR1 ‘Flood risk and water management’ and FR2 ‘Bristol Avon Flood Strategy’. ○ Covered by references in Local Plan Publication Version Policy DS3 ‘St Philip’s Marsh’ to creation of an enhanced multi-purpose greenway and new and enhanced walking and cycle routes. • Any proposals for the Wholesale and Fruit Market will be considered against all relevant planning policies and considerations. • Lack of evidence to suggest redevelopment potential in short- or medium-term. • Local Plan Publication Version Policy DS3 ‘St Philip’s Marsh’ sets out approach to flood risk in this location. Supported by Publication Version policies FR1 ‘Flood risk and water management’ and FR2 ‘Bristol Avon Flood Strategy’.

Main issues raised	How they were addressed
<p>from new development or associated mitigation measures. They also advised regard be had to River Avon Tidal Flood Risk Management Strategy and updated Strategic Flood Risk Assessment.</p> <ul style="list-style-type: none"> • Network Rail requested consideration be given to impacts of future proposals and the round-the-clock, industrial operations of St Philip’s Marsh Train Depot. 	<ul style="list-style-type: none"> • Addressed by Local Plan Publication Version policies HW1 ‘Pollution control and water quality’ and HW1A ‘Noise’. These will ensure noise-sensitive development proposals consider nearby existing uses.

Proposal CDS 4: Western Harbour – Development at Cumberland Basin

Table 7 - main issues raised on Proposal CDS 4: Western Harbour – Development at Cumberland Basin and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Potential harm to important character, views, heritage assets and features. • Need for new transport infrastructure. • Proposals too vague. • Loss of important maritime industries. • Proposals for roads and tall buildings considered inappropriate. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy DS4 ‘Western Harbour’ refers to proposals having regard to area’s important heritage assets and responding appropriately to key views and landmarks. • Policy DS4 ‘Western Harbour’ includes references to provision of reconfigured road system and new walking and cycling routes. • Further detail added to Local Plan Publication Version Policy DS4 ‘Western Harbour’. • Supporting text to Local Plan Publication Version Policy DS4 ‘Western Harbour’ makes clear that maritime industries at Underfall Yard will continue to be retained. • Rationale for replacement roads provided in introductory text to Policy DS4 ‘Western Harbour’. Policy makes clear tall buildings may be appropriate and cross refers to Policy DC2 ‘Tall buildings’. This sets out criteria to

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Loss of green / open spaces. • Need for flood Risk mitigation and infrastructure improvements. • Local wildlife assets such as Avon New Cut Local Nature Reserve should be protected and enhanced. • Improving air quality in this location needs to be considered and addressed. • Remove River Avon New Cut area as has different character and important land uses and assets. • New policy needed to replace Central Area Plan Policy BCAP41 'The Approach to Harbourside' in order to focus tourism development in Harbourside area. • Bonded Warehouses should be used for housing instead of new developments being promoted. 	<p>ensure important planning considerations are appropriately considered.</p> <ul style="list-style-type: none"> • Addressed with references in Policy DS4 'Western Harbour' to the retention and provision of high quality public open spaces. • Policy DS4 'Western Harbour' sets out approach to provision of flood risk mitigation measures in this location. Supported by Publication Version policies FR1 'Flood risk and water management' and FR2 'Bristol Avon Flood Strategy'. • Addressed with references in Policy DS4 'Western Harbour' to the retention and provision of high quality public open spaces incorporating green infrastructure. Also covered by policies in the Local Plan Publication Version's chapter on 'Biodiversity and nature recovery'. • Addressed by references to development including new sustainable travel routes in this location. Issue also addressed by Local Plan Publication Version Policy HW2 'Air quality'. • River Avon New Cut area considered appropriate for inclusion given its development potential and locational attributes, as described in the policy. • Approach to tourism-related development set out in Local Plan Publication Version policies DS1 'Bristol City Centre' and SSE1 'Supporting Bristol's Centres - network and hierarchy'. • Supporting text to Publication Version Policy DS4 'Western Harbour' explains that the policy provides for the appropriate mixed-use conversion of the bonded warehouses subject to relevant planning policies for design and conservation.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Historic England considered that proposals should be informed by adequate assessment of existing heritage assets. • North Somerset Council and Wessex Water requested consultation on any proposed changes to road network and water infrastructure, respectively. 	<ul style="list-style-type: none"> • Policy DS4 'Western Harbour' refers to proposals having regard to area's important heritage assets and responding appropriately to key views and landmarks. • Consultation will be undertaken in accordance with relevant requirements as proposals emerge.

East Bristol

Table 8 - main issues raised on East Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • South Gloucestershire Council advised joint-working so that proposals with cross-boundary impacts such as transport, employment land and infrastructure (e.g. schools) provision can be adequately addressed. 	<ul style="list-style-type: none"> • Ongoing cross-boundary engagement has taken place in preparation of Local Plan.

Proposal CDS 5: Lawrence Hill

Table 9 - main issues raised on Proposal CDS 5: Lawrence Hill and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concerns about operational impacts on existing businesses from new residential uses, leading to their eventual loss. • Specific reference / more emphasis sought on: <ul style="list-style-type: none"> ○ school provision requirements to 	<ul style="list-style-type: none"> • Addressed by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses. • Specific references sought: <ul style="list-style-type: none"> ○ Not considered necessary to make particular mention as covered by general reference in Local Plan

Main issues raised	How they were addressed
<p>meet housing growth.</p> <ul style="list-style-type: none"> ○ Bristol to Bath Railway Path corridor and its importance to active travel. ○ High level of advertising displays boards locally compared with other parts of the city and their harmful impacts on residential amenity. 	<p>Publication Version Policy DS6 'Lawrence Hill' to new development providing supporting infrastructure, services and community facilities.</p> <ul style="list-style-type: none"> ○ Policy DS6 'Lawrence Hill' refers to Bristol and Bath Railway Path and how development will be expected to provide new and/or improved pedestrian and cycle links to it. ○ Addressed in Local Plan Publication Version Policy AD1 'Advertisements'.

Proposal CDS 6: Central Fishponds

Table 10 - main issues raised on Proposal CDS 6: Central Fishponds and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Operational impacts on existing businesses from new residential uses, leading to their eventual loss. ● Appropriateness of tall buildings. ● Need to restrict additional student housing to protect amenity. ● Risk of overdevelopment with harmful impacts such as car parking pressures due to lack of supporting infrastructure provision. 	<ul style="list-style-type: none"> ● Addressed by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW1A 'Noise'. These will ensure noise-sensitive development proposals consider nearby existing uses. ● Local Plan Publication Version Policy DS7 'Central Fishponds' makes clear that tall buildings may be appropriate and cross refers to Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered. ● Issue addressed in Local Plan Publication Version Policy H7 'Managing the development of purpose-built student accommodation'. ● Policy DS7 'Central Fishponds' refers to new development providing supporting infrastructure, services and community facilities. Transport impacts of proposals covered by Local Plan Publication Version

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Need for sustainable transport improvements to address air quality issues. • Risk of new development reversing recent local improvements in biodiversity. 	<p>Policy T3A 'Transport development management', amongst others.</p> <ul style="list-style-type: none"> • Policy DS7 'Central Fishponds' makes reference to development being supported by public transport enhancements and cycle and pedestrian route improvements. • This issue covered by policies in the Local Plan Publication Version's chapter on 'Biodiversity and nature recovery'.

South Bristol

Table 11 - main issues raised on South Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Failure to address economic development and long-term socio-economic condition of South Bristol. • Lack of a co-ordinated or integrated approach, e.g. housing delivery needs to be supported with a transport strategy, including active travel links, and sufficient employment land allocations. 	<ul style="list-style-type: none"> • Supporting text to Local Plan Publication Version chapter on South Bristol explains approach to addressing this issue. Building on recent significant health, workspace, educational and transport infrastructure improvements and provision, it refers to Local Plan approach of continuing to safeguard large areas of land for industry. New industry and distribution locations are also proposed, while new workspace will be created in growth and regeneration areas as well as part of mixed-use development allocations. • Area policies within South Bristol chapter of Local Plan Publication Version make reference to expected local transport improvements as part of new development proposals. Overall approach set out in Local Plan Publication Version Policy T2 'Transport infrastructure improvements'. Provision of employment land allocations addressed in above bullet point. City-wide approach to employment land provision set out in Local Plan Publication Version 'Policy E2: Economic development land strategy'.

Proposal CDS 7: Central Bedminster and Parson Street

Table 12 - main issues raised on Proposal CDS 7: Central Bedminster and Parson Street and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Potential negative impacts on character and supporting infrastructure resulting from scale, density and height of proposed development. High density mid-rise and terraced housing advocated as an alternative. • Need to ensure type and tenure of new housing provides high levels of affordable, social rent or community housing, plus homes for families and the elderly. • Loss of employment / business sites. • Inadequate public transport and community infrastructure to support proposed growth. 	<ul style="list-style-type: none"> • The area’s good public transport infrastructure and proximity to city centre, as described in supporting text to Local Plan Publication Version Policy DS8 ‘Central Bedminster’, support higher density development approach. Potential impacts on character addressed in Policy DS8’s reference to development taking account of the Bedminster conservation area, supported by policies in the Local Plan’s chapter on ‘Design and conservation’. • Development contributing to an appropriate mix of housing type referenced in Policy DS8 ‘Central Bedminster’. Issue also covered by Publication Version Policy H4 ‘Housing type and mix’. • Policy DS8 ‘Central Bedminster’ makes reference to development including the provision of high quality workspace, providing for a range of business uses, as part of mixed-use development. The area’s good credentials for higher density mixed-use development are explained in supporting text to the policy with reference to high public transport accessibility and proximity to the city centre. Such an approach is also considered appropriate given evidence of under-used or vacant commercial sites in this location. • The area’s good public transport infrastructure is explained in introductory text to Policy DS8 ‘Central Bedminster’ with reference to train station and MetroBus services. Policy refers to how new development will deliver enhancements to train station, strengthened pedestrian and cycle links and local highway improvements.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Impacts on open spaces. • Need for a masterplan to ensure a 'joined-up' approach, including effective community involvement. 	<p>Policy DS8 also refers to new development providing supporting infrastructure, services and community facilities.</p> <ul style="list-style-type: none"> • Policy DS8 'Central Bedminster' refers to development including green infrastructure and public realm enhancements as well as new and enhanced open space, with reference to Policy GI A 'Open space for recreation'. • Policy DS8 'Central Bedminster' makes reference to development proposals being expected to accord with regeneration frameworks which will coordinate approach to development across the area. Community engagement on preparation of these will increase their effectiveness in ensuring a co-ordinated approach.

Proposal CDS 8: Brislington

Table 13 - main issues raised on Proposal CDS 8: Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Development should be higher density than proposed. • Loss of suburban character. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy DS9 'Brislington' sets out an appropriate approach taking into account development potential and locational characteristics, as described in supporting text to the policy. • Supporting text to Policy DS9 'Brislington' identifies opportunities for an urban living approach along parts of the Bath Road corridor. This is considered appropriate given area's good public transport accessibility and evidence of under-used sites. Policy DS9 addresses design / character issues with reference to new development creating stronger and more coherent built frontages to Bath Road, with associated improvements to the public realm. This will be supported by the application of policies in the Local Plan Publication Version's 'Design and conservation' chapter.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Inappropriateness of tall buildings. • Loss of employment / industrial land to residential use. • Worsened air quality. • Need for new infrastructure to accompany development, including improved pedestrian and cycle routes and green spaces. 	<ul style="list-style-type: none"> • Tall buildings not specifically referred to in draft policy and this is maintained in Publication Version Policy DS9 'Brislington'. Any tall building proposals will be considered with reference to Policy DC2 'Tall buildings' and all other relevant policies. • Policy DS9 'Brislington' makes reference to development including the provision of high quality workspace, providing for a range of business uses, as part of mixed-use development. Approach of Policy DS9 considered appropriate given area's good public transport accessibility and evidence of under-used sites, as explained in supporting text. • Addressed by references in Policy DS9 'Brislington' to development including new sustainable travel routes in this location. Issue also addressed by Local Plan Publication Version policies HW1 'Pollution control and water quality' and HW2 'Air quality'. • Policy DS9 'Brislington' makes reference to development including new sustainable travel routes in this location and green infrastructure and public realm enhancements.

Proposal CDS 9: New neighbourhood – Bath Road, Brislington

Table 14 - main issues raised on Proposal CDS 9: New neighbourhood – Bath Road, Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Site boundary should be larger. • Loss of green belt land. 	<ul style="list-style-type: none"> • Boundary considered appropriate and maintained for Local Plan Publication Version Policy DS12 'New neighbourhood – Bath Road, Brislington'. • Rationale explained in draft proposal, which is maintained for Publication Version Policy DS12.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Additional pressure on transport and infrastructure, worsening congestion and air quality issues. • Objection to tall buildings. • Protect heritage value of old mine workings in locality. • Justification questioned for 40% of new homes to be affordable. 	<ul style="list-style-type: none"> • Addressed by Policy DS12's reference to new development being supported by appropriate local and strategic transport infrastructure. • Tall buildings not specifically referred to in draft policy and this is maintained in Publication Version Policy DS12. Any tall building proposals will be considered with reference to Policy DC2 'Tall buildings' and all other relevant policies. • Policy DS12 makes reference to development being subject to the preparation of a detailed development framework or master plan prepared in consultation with the local community and stakeholders. Taking into account any local heritage issues can be part of this masterplanning work. Also likely to be relevant will be policies from the Local Plan Publication Version's 'Design and conservation' chapter, including Policy CHE1 'Conservation and the historic environment'. • Policy DS12 expects development to provide an appropriate level of affordable housing (35% of new homes). This is supported by Publication Version Policy AH1 'Affordable housing provision'.

Hengrove and Knowle West

Table 15 - main issues raised on Hengrove and Knowle West and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Important that Hengrove Park, Hartcliffe campus and Whitchurch Park Spatial Framework: <ul style="list-style-type: none"> ○ Retains wildlife. 	<ul style="list-style-type: none"> • Local Plan Publication Version explains that Hengrove and Whitchurch Park Neighbourhood Plan came into force in 2019 and this will steer approach to development in this location.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Ensures carbon neutral development. ○ Protects open space. ○ Has regard to Whitchurch Village Neighbourhood Plan. ○ Includes a rapid transit link to Whitchurch Park. ○ Provided sufficient employment opportunities. ● Knowle West: <ul style="list-style-type: none"> ○ objection to any additional housing on the Slopes area. 	<ul style="list-style-type: none"> ● Housing allocations in Knowle West are set out in Local Plan Publication Version Policy DA1 'Proposed development allocations' with detail and rationale provided in supporting annex.

Proposal CDS 10: Revised Green Belt boundary at south west Bristol

Table 16 - main issues raised on Proposal CDS 10: Revised Green Belt boundary at south west Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Objection to principle of Green Belt release. ● Exhaust Brownfield sites first. ● Potential for large cross-boundary urban sprawl into North Somerset. ● Likelihood of increased traffic congestion, parking issues and pressure on community infrastructure and services. 	<p>The draft proposals in 2018 and 2019 have been amended for the Local Plan Publication Version following consultation in 2022. Land at Yew Tree Farm is no longer proposed as a development allocation. The approach to remove from the Green Belt land at Ashton Vale and adjacent to Elsbert Drive and identify them as development allocations has been maintained. Local Plan Publication Version policies DS10 'The Green Belt' and DS11 'Development allocations – southwest Bristol' refer. The approach is considered appropriate to ensure a sufficient number and range of development sites is available to meet housing need.</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Need for affordable housing and concern it will not be delivered. • Impact of development on wildlife corridors and views to the city. • Loss of high value Green Belt open spaces for amenity including recreation and wellbeing. • Need to ensure sustainable long term employment opportunities area. • Concerns about worsening flood risk. • Negative impact on Yew Tree farm. • Wessex Water thought that, if the proposal was to proceed, improvements could be facilitated to Colliter's Brook. • North Somerset Council commented that: <ul style="list-style-type: none"> ○ Any proposed change to Green Belt should be fully justified. ○ All options for meeting housing need should be examined prior to proposing changes. ○ Proposing Green Belt boundary change to correspond with new link road may not meet NPPF 	<p>Policy DS11 explains that land at Ashton Vale has now received planning permission (ref. 21/03166/P) for around 500 homes. It also states that development adjacent to Elsbert Drive should be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community.</p>

Main issues raised	How they were addressed
<p>para. 85 requirements.</p> <ul style="list-style-type: none"> ○ Bedminster Down: This extensive tract of land may not meet criteria for Local Green Space designation. An alternative finger of Green Belt land stretching into Bristol from North Somerset suggested as improving recreational opportunities and enhancing ridge landscape value. ○ Ashton Vale: to avoid merger with Long Ashton important to consider that land north of Ashton Vale Town Green is adjacent to an Area of Separation designated in Long Ashton Neighbourhood Plan. ○ Consideration should be given to safeguarding a new access road into rear of Ashton Vale Industrial Estate. This is to reflect the MetroWest Portishead rail line re-opening proposal. 	

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Network Rail advised consideration of a new industrial estate access road, plus how existing freight operations will be maintained. 	

North Bristol

Proposal CDS 11: Lockleaze

Table 17 - main issues raised on Proposal CDS 11: Lockleaze and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Adequate infrastructure required such as school and sustainable transport improvements. Links to University of West of England campus needed, particularly through improved active travel infrastructure. Stoke Park should be referred to as a gateway to the city and important green space. 	<p>Since the 2018 consultation Lockleaze has seen the opening in 2021 of a new £25m 400-pupil secondary school. Work on the Lockleaze Sustainable Transport Infrastructure project is also underway. A new accessible all-weather path connecting Lockleaze to Stoke Park was opened in 2022 and work is nearing completion on major works in Muller Road to facilitate a bus lane and cycle and walking infrastructure improvements.</p> <p>Local Plan Publication Version Policy DS13 'Lockleaze' builds on this with its reference to development including new and improved walking and cycling routes to connect to surrounding neighbourhoods, public transport facilities and the wider cycle network.</p>

Proposal CDS 12: Central Southmead and Southmead Road

Table 18 - main issues raised on Proposal CDS 12: Central Southmead and Southmead Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Policy should ensure development aligns with Southmead Community Plan and priorities of the Southmead Development Trust. 	<p>The draft proposal has been amended for the Local Plan Publication Version as Policy DS14 'Central Southmead' no longer includes the Southmead Road area. The Publication Version policy reflects Southmead Community Plan's aspirations with its references to development</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Emphasis should also be on open space, public realm and active and public transport improvements. 	providing an appropriate housing mix and improved community facilities.

Lawrence Weston

Table 19 - main issues raised on Lawrence Weston and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Protect habitats in and around Lawrence Western Moor. Improve interrelationship between residential and surrounding industrial uses and motorway, including mitigating harmful impacts. 	Local Plan Publication Version explains that the Lawrence Weston Neighbourhood Plan will continue to steer the approach to development in this location.

Proposal CDS 13: Avonmouth Village – Protecting the living conditions of residents

Table 20 - main issues raised on Proposal CDS 13: Avonmouth Village – Protecting the living conditions of residents and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Bristol Port Company considered the proposal lacks evidence, fails to recognise existing pollution control regimes, would be ineffective, disproportionate and interfere with the statutory undertakings of the port. Wessex Water considered that any proposed mitigation measures must not inhibit its ability to effectively operate the Avonmouth sewage treatment works. 	Draft proposal not taken forward. Local Plan Publication Version contains a number of policies which will ensure potential harmful impacts of development proposals are adequately considered and addressed. These include policies HW1 'Pollution control and water quality', HW2 'Air quality', HW1A 'Noise' and HW1B 'Contaminated land'. Issue raised around houses of multiple occupation will be addressed by Publication Version Policy H6 'Houses in multiple occupation and other shared housing'.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Consider extending area of protection and mitigation to cover Lawrence Weston and Shirehampton. • Concern about numbers of Houses of Multiple Occupation and resulting impact on family homes. 	

Delivering new homes through urban living

Proposal ULH 1: Provision of new and affordable homes

Table 21 - main issues raised on Proposal ULH 1: Provision of new and affordable homes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Clarity sought on whether housing figures include student housing need. • More emphasis needed on providing small family / younger professional homes and community-led housing. • Include requirement for Private Rented Accommodation within overall housing number. • Too much emphasis on meeting housing targets over sustainable development. • Housing target number does not meet objectively assessed need. 	<ul style="list-style-type: none"> • Student housing need addressed by Local Plan Publication Version Policy H7 'Managing the development of purpose-built student accommodation'. • Local Plan approach is to ensure new development provides an appropriate mix of housing types; Publication Version Policy H4 'Housing type and mix' refers. • Approach to overall housing target set out in Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement'. Private Rented Accommodation requirement not considered appropriate. • Approach consistent with national planning policy. • Target set out in Local Plan Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement' considered appropriate and supported by relevant evidence.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Express targets as a minimum. • Objection to approach encouraging redevelopment of vacant and under used office or industrial land: <ul style="list-style-type: none"> ○ Could harm economic and sustainable development; ○ Underused appearance of industrial land may not reflect actual importance for successful operational use of the site. ○ Businesses struggling to secure long term leases on industrial areas, with short-term leases unviable. ○ Concerns about incompatibility of introducing residential uses into industrial areas, and consequent impacts on sustaining industrial uses. ○ No consideration of impact of losing employment sites. ○ Concern that development proposals on employment sites outside of key locations will no 	<ul style="list-style-type: none"> • Target is expressed as a minimum. • Approach is explained in introductory text to Publication Version’s ‘Housing’ chapter. It is considered appropriate and supported by national planning policy. Policies to encourage sustainable economic growth set out in the Publication Version’s ‘Economy and inclusive growth’ chapter.

Main issues raised	How they were addressed
<p>longer have to demonstrate an absence of a demand for employment uses.</p> <ul style="list-style-type: none"> • Highways England sought specific reference to requiring necessary infrastructure to deliver the new homes proposed. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy IDC1 'Development contributions and CIL' will be used to ensure new development is supported by the provision of infrastructure, services and facilities.

Proposal ULH 2: Affordable housing

Table 22 - main issues raised on Proposal ULH 2: Affordable housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Clarify definition of affordable housing. Social housing needed for people on low incomes not just a general definition of 'affordable'. • Affordable housing percentage target considered to be: <ul style="list-style-type: none"> ○ Too low: <ul style="list-style-type: none"> ▪ Higher Percentage sought, e.g. 60%. ○ Too high: <ul style="list-style-type: none"> ▪ Inconsistent with national policy and lacking justification. • More flexible percentage targets required for different parts of the city. 	<ul style="list-style-type: none"> • Definition provided in Local Plan Publication Version Policy AH1 'Affordable housing provision' which reflects the NPPF. • Appropriate percentage target set out in Publication Version Policy AH1 'Affordable housing provision'. • Such an approach provided for in Publication Version Policy AH1, which is based on latest assessments of development viability for

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Proposed site size threshold of 5 dwellings considered to be: <ul style="list-style-type: none"> ○ Too low. Counter-productive for small developments / small builders. Suggest minimum should be 10 units; ○ Too high. Should be reduced to 4 units. • Concern about links with Joint Spatial Plan policy as latter has not been viability tested. • Viability assessment needed, including in combination with other policies. 	<p>each location referred to in the policy.</p> <ul style="list-style-type: none"> • Site size threshold set out in Local Plan Publication Version Policy AH1 consistent with NPPF. • Joint Spatial Plan withdrawn in 2020. • Local Plan Publication Version supported by viability assessment.

Proposal ULH 3: Urban living – making efficient use of land to meet our needs

Table 23 - main issues raised on Proposal ULH 3: Urban living – making efficient use of land to meet our needs and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Support higher density development approach but not through tall buildings. • As well as higher density development, approach should also focus on delivering: <ul style="list-style-type: none"> ○ Sustainable active travel; 	<ul style="list-style-type: none"> • Tall buildings can contribute to helping Bristol accommodate new development. Local Plan Publication Version Policy DC2 ‘Tall buildings’ sets out criteria to ensure important planning considerations are appropriately considered in determining tall building applications. • Issues addressed in various Local Plan Publication Version policies including: Policy T1 ‘Development and transport policies’; Policy DPM1 ‘Delivering well-designed, inclusive places’; Policy SSE1 ‘Supporting Bristol’s Centres - network and hierarchy’; and Policy DC1 ‘Liveability in residential

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Good design; ○ Mix of uses not just residential; ○ Regeneration of neighbourhoods across the city; ○ Liveable indoor and outdoor spaces. ● More clarity sought on: <ul style="list-style-type: none"> ○ What represents ‘development which fails to make efficient use of land’; ○ Assessment of infrastructure impacts resulting from proposal (e.g. on road network, parking, accessibility, child safety, access to open space). ● Bristol Avon Catchment Partnership thought reference to creating liveable environment should specify one which is adaptable to climate change. ● Historic England sought addition to policy wording so that new development is expected to reflect Bristol’s Urban Character ‘and the significance of its heritage assets’. 	<p>development including space standards and private outdoor space’.</p> <ul style="list-style-type: none"> ● Clarifications sought: <ul style="list-style-type: none"> ○ Addressed in explanatory text to Local Plan Publication Version Policy UL1 ‘Effective and efficient use of land’. ○ Addressed by Local Plan Publication Version Policy T3A ‘Transport development management’. This requires a Transport Assessment / Statement to be submitted alongside a planning application where development is likely to have a significant traffic impact. ● Addressed in Local Plan Publication Version Policy NZC4 ‘Adaptation to a changing climate’. ● Addressed in Local Plan Publication Version policies DPM1 ‘Delivering well-designed, inclusive places’ and CHE1 ‘Conservation and the historic environment’.

Proposal ULH 4: Tall buildings

Table 24 - main issues raised on Proposal ULH 4: Tall buildings and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of detail on how developments will be determined. • Over-reliance on Urban Living supplementary planning document – detail and viability implications should be addressed in Local Plan. • Tall buildings out of character in Bristol. • Negative impacts not adequately understood or assessed. • Policy should include specific locations appropriate for tall buildings, e.g. central and accessible locations such as around Temple Meads. 	<ul style="list-style-type: none"> • Addressed in Local Plan Publication Version Policy DC2 ‘Tall buildings’. • Considered appropriate for detail on application of Local Plan policy to be provided by Supplementary Planning Document. Local Plan supported by viability assessment. • Policy DC2 sets out criteria to ensure important planning considerations such as character are appropriately considered in determining tall building applications. • Policy DC2 sets out criteria to ensure potential impacts are appropriately considered in determining tall building applications. • Policy DC2 provides locational guidance with focus on areas identified as suitable for most intensive forms of development or as identified in policies for specified regeneration areas.

Proposal ULH 5: Fire safety

Table 25 - main issues raised on Proposal ULH 5: Fire safety and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Proposal not a planning matter. Should be dealt with through Building Regulations regime. 	<ul style="list-style-type: none"> • Proposal not taken forward in subsequent Local Plan Review consultations.

Managing student housing and University development

Proposal ULH 6: Specialist student accommodation

Table 26 - main issues raised on Proposal ULH 6: Specialist student accommodation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More restrictive approach needed as any increase in student numbers considered unsustainable. • As well as meeting increase in student numbers, approach should address existing shortfall of purpose-built student housing, as evidenced by reliance on Houses in Multiple Occupation. • Proposed locations for specialist student accommodation: <ul style="list-style-type: none"> ○ Objection as it constrains development of equally appropriate sites outside preferred areas. ○ Concern about expansion of accommodation in University of Bristol precinct, Clifton campus and Stoke Bishop campus on grounds of amenity impacts such as character and car parking. • Affordable Student Housing provision proposal: 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy H7 ‘Managing the development of purpose-built student accommodation’ provides an appropriate approach. It seeks to ensure a sustainable increase in purpose-built student accommodation is achieved by ensuring schemes come forward in appropriate locations. This will maintain a balance between the needs of the wider community and delivering high quality and well-managed accommodation. • Publication Version Policy H7 considered to adequately address student housing need. Supporting text to policy sets out the identified need for student bed spaces. • Specialist student accommodation locations: <ul style="list-style-type: none"> ○ Publication Version Policy H7 allows for student accommodation in locations other than those identified, subject to proposals avoiding specified impacts and meeting other objectives described in policy and supporting text. ○ Publication Version Policy H7 seeks to ensure a sustainable expansion is achieved by allowing for some additional accommodation up to specified bed space limits within the University of Bristol precinct and at other residential sites. Proposals at Clifton and Stoke Bishop campuses will be subject to a Masterplan and should not give rise to significant additional demand for on-street parking. • Affordable Student Housing provision proposal:

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Definition unclear; ○ Lack of evidence e.g. justifying ‘identified need’; ○ Contrary to NPPF para. 65. ● Criteria 1: General Purpose Affordable Housing: <ul style="list-style-type: none"> ○ Unreasonable as does not accord with national policy. ○ Unclear how it would be implemented (i.e. a 35% affordable housing requirement cannot be applied to student units in the same way as standard housing). ● Criteria 2: Harmful Impacts: <ul style="list-style-type: none"> ○ Lack of clarity on meaning of ‘undesirable concentration’ and ‘harmful impacts’. ● Criteria 3: Mix of uses and Large Scale proposals: <ul style="list-style-type: none"> ○ Concern it would not support greater quality of life. Reduce proportion to 20% student floorspace. ○ Clarity needed on ‘substantial proportion’. 	<ul style="list-style-type: none"> ○ Definition provided in Publication Version Policy H7. ○ Justification provided in Publication Version Policy H7. ○ NPPF para. 65 is not relevant to the provision of affordable student housing. ● Criteria 1: General Purpose Affordable Housing: <ul style="list-style-type: none"> ○ Approach amended for Publication Version Policy H7. A contribution towards general purpose affordable housing is now expected only for schemes which include self-contained accommodation. Such units will be considered as dwellings for the purposes of calculating any affordable housing contribution under Publication Version Policy AH1 ‘Affordable housing provision’. ● Criteria 2: Harmful Impacts: <ul style="list-style-type: none"> ○ Clarification and more detail provided in Publication Version Policy H7. ● Criteria 3: Mix of uses and Large Scale proposals: <ul style="list-style-type: none"> ○ Approach amended for Publication Version Policy H7. Purpose-built student accommodation as part of mixed-use developments now sought only where feasible and appropriate in locations other than those specified for student accommodation.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Viability testing needed as could make purpose-built private sector student accommodation unviable. ● Criteria 4: Active Frontages: <ul style="list-style-type: none"> ○ proposal should be informed by viability testing. 	<ul style="list-style-type: none"> ● Criteria 4: Active Frontages: <ul style="list-style-type: none"> ○ Approach considered appropriate and maintained for Publication Version Policy H7. Flexibility provided with policy's reference to active frontage provision wherever possible and appropriate.

Proposal ULH 7: Housing in Multiple Occupation

Table 27 - main issues raised on Proposal ULH 7: Housing in Multiple Occupation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Clarification sought on: <ul style="list-style-type: none"> ○ Meaning of 'harmful impacts and / or concentrations'; ○ How proportion of HMOs within a 'given area' and how 'housing stock' will be defined; ○ The approach for areas which already exceed the 10% threshold; ○ Justification for the 10% threshold. ● Approach to HMOs undermines their value, particularly in providing accommodation for young 	<ul style="list-style-type: none"> ● Clarifications sought: <ul style="list-style-type: none"> ○ Addressed in explanatory text to Local Plan Publication Version Policy H6 'Houses in multiple occupation and other shared housing', supported by reference to 'Managing the development of houses in multiple occupation' Supplementary Planning Document. Percentage threshold considered reasonable and appropriate for reasons set out in explanatory text to policy. ● Positive contribution that HMOs can make to choice and affordability of housing is reflected in introductory text to Publication Version Policy H6. Policy seeks to ensure

Main issues raised	How they were addressed
people starting their careers.	appropriate balance between provision of HMOs and avoiding harmful impacts.

Proposal ULH 8: Older people’s housing

Table 28 - main issues raised on Proposal ULH 8: Older people’s housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Ensure sufficient number of sites are allocated and located where older people want to live. • Lack of justification for requirement for older people’s housing homes to be delivered as a requirement on market housing sites. • Needs to clearly define what constitutes older persons’ accommodation. Affordable housing should only be sought from Use Class C3 housing rather than C2 where on-site, specialist care is provided. 	<ul style="list-style-type: none"> • Approach of Local Plan Publication Version Policy H8 ‘Older people’s and other specialised needs housing’ is to encourage a range of older people’s and specialised needs housing options. Policy also provides guidance on appropriate location of schemes. • Draft proposal not taken forward in Local Plan Publication Version Policy H8. • Clarification provided in supporting text to Publication Version Policy H8.

Proposal ULH 9: Accessible homes

Table 29 - main issues raised on Proposal ULH 9: Accessible homes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Clarify definition of ‘larger schemes’. • Should reference accessible housing to be located on the most accessible part of 	<ul style="list-style-type: none"> • Clarified in Local Plan Publication Version Policy H9 ‘Accessible homes’ that this relates to proposals for 10 or more dwellings. • Addressed in Publication Version Policy H9 with its reference to all new build housing being designed to be accessible and

Main issues raised	How they were addressed
<p>any site.</p> <ul style="list-style-type: none"> • Proposal not justified by evidence nor reflects national planning guidance. • Viability of proposal needs testing. • Proposal for 10% of new homes in larger schemes to be wheelchair accessible: <ul style="list-style-type: none"> ○ Should be flexibly applied on a site-by-site basis. ○ Should be 20%. 	<p>adaptable in compliance with Building Regulations M4(2) Category 2: Accessible and adaptable dwellings. The explanatory text to the policy considers site topography.</p> <ul style="list-style-type: none"> • Justification provided in introductory text to Publication Version Policy H9. • Local Plan Publication Version supported by viability assessment. • Approach of draft proposal maintained for Publication Version Policy H9. This requires at least 10% of new build housing in proposals of 10 dwellings or more designed to be wheelchair accessible. This is considered appropriate for reasons set out in introductory text.

Proposal ULH 10: Self-build accommodation

Table 30 - main issues raised on Proposal ULH 10: Self-build accommodation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Define self-build and custom build. • Should include Community-Led Housing. • Overall housing target should include percentage to be delivered through self-build housing: <ul style="list-style-type: none"> ○ Support received with 20% suggested. ○ Objection also received. 	<ul style="list-style-type: none"> • Definitions provided in Local Plan Publication Version Policy H5: 'Self-build and community-led housing'. • Approach amended so that Publication Version Policy H5 also includes provisions for community-led housing. • Approach has evolved from 2018. Publication Version Policy H5 uses a range of policy mechanisms to help meet identified demand including: <ul style="list-style-type: none"> ○ encouraging provision of new homes through self-build, custom housebuilding and other community-led approaches; ○ allocating three sites for this form of housing;

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Further consideration needed about interaction of self-build allocations as part of larger housing sites. • Lack of evidence to justify policy, such as no viability assessment. 	<ul style="list-style-type: none"> ○ requiring at least 5% of homes on two housing allocation sites on former Green Belt land to be for this form of housing; and ○ seeking a proportion of this form of housing as part of the overall development of identified growth and regeneration areas. • Supporting text to Publication Version Policy H5 provides more guidance on the provision of self-build housing as part of larger housing sites. • Justification for approach provided in introductory text to Publication Version Policy H5. Local Plan Publication Version supported by viability assessment.

Economy and employment land

Table 31 - main issues raised on Economy and employment land and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Under-allocation of employment land, including lack of suitable office space, and imbalance between employment land and housing need. • Phrase ‘consolidate our economic strengths’ does not demonstrate pro-growth approach. • Historic England noted no reference to visitor/tourism economy. 	<ul style="list-style-type: none"> • Strategic policy approach to the scale and location of new workspace to be delivered over the plan period set out in Local Plan Publication Version Policy E2 ‘Economic development land strategy’. • Local Plan Publication Version Policy E2 sets out aim to secure sustainable and inclusive economic growth through development of new workspace and retention of core industrial land. • Reference included in ‘Economy and inclusive growth’ chapter of Local Plan Publication Version.

Avonmouth Industrial Areas and Bristol Port

Proposal EC 1: Avonmouth Industrial Areas

Table 32 - main issues raised on Proposal EC 1: Avonmouth Industrial Areas and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Access 18: <ul style="list-style-type: none"> ○ Greenfield land suggested as potential mixed commercial and industrial use. ○ Any expansion of St. Modwen/Access 18 would need improved transport links and access. • Limited reference to nationally significant activities at Bristol Port. • Historic England noted lack of reference to importance of archaeology in low-lying Avonmouth Levels. • Environment Agency sought retention of existing pollution policies and updating of evidence base. • Highways England thought implications for M5 should be considered, particularly at Junction 18 taking account of new M49 junction. 	<ul style="list-style-type: none"> • Access 18: <ul style="list-style-type: none"> ○ Site allocation included in 2019 consultation document for development of industrial and distribution uses on land at Kings Weston Lane, south of Access 18 (Policy E4: Avonmouth Industrial Area and Bristol Port). ○ Planning permission has been granted for mixed commercial/industrial development on land at the proposed site allocation at Kings Weston Lane, south of Access 18. • Addressed in Local Plan Publication Version Policy E4 'Avonmouth Industrial Area and Bristol Port'. • Addressed in Local Plan Publication Version Policy E4. • Pollution policies contained in 'Health, wellbeing and food sustainability' chapter of Local Plan Publication Version. Flood risk policies within 'Net zero and climate' chapter, informed by appropriate evidence. • Draft policy approach informed by transport evidence prepared for the Local Plan Review.

The city's core industrial estates

Proposal EC 2: Industry and Distribution Areas

Table 33 - main issues raised on Proposal EC 2: Industry and Distribution Areas and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More flexible approach needed to take advantage of mixed-use brownfield development opportunities as per urban living aim. • Approach favours hi-tech industries over low-tech manufacturing sector. • Does not demonstrate how industrial growth will be achieved as Industry and Distribution Areas require investment and safeguarding to meet future needs. • Article 4 Directions needed to protect key office sites from conversion to residential uses. • Need to support artist and creative spaces. • Following sites considered inappropriate for protection under EC2: Netham Road / Blackswarth Road, Fishponds Trading Estate, Hawkfield Business 	<ul style="list-style-type: none"> • Approach considered appropriate for reasons set out in introductory text to draft policy. • Industry and Distribution Areas contain wide variety of existing occupiers and policy approach supports this diversity. • Local Plan Publication Version Policy E2 'Economic development land strategy' provides the strategic policy approach to securing sustainable and inclusive economic growth through development of new workspace and retention of core industrial land. Publication Version Policy E5 'Industry and Distribution Areas' identifies the city's core industrial land and reserves it for continued use. • Lack of evidence to suggest Article 4 Directions are appropriate. Monitoring of office floorspace gains and losses is on-going and will inform the review of the Local Plan. • Provision of such spaces supported by various policies in Local Plan Publication Version, including policies E2 'Economic development land strategy', E5 'Industry and Distribution Areas', E6 'Affordable workspace' and SSE5 'Temporary uses in centres'. • Local Plan Publication Version Policy EC2 identifies these sites as Industry and Distribution Areas due to their strategic economic importance and suitability for industrial and warehousing premises which could accommodate a wide range of sectors.

Main issues raised	How they were addressed
<p>Park, and New Gatton Road.</p> <ul style="list-style-type: none"> Remove Principal Industrial and Warehousing Area designation from Brabazon Hanger. 	<ul style="list-style-type: none"> Brabazon Hanger not identified as an Industry and Distribution Area.

New forms of work space

Proposal EC 3: New forms of work space

Table 34 - main issues raised on Proposal EC 3: New forms of work space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Inappropriate to require development of former industrial / distribution land to provide new workspace. Request provision is made for sustainability industry and studio, hobby and workshop space. 	<ul style="list-style-type: none"> Clarification made to Local Plan Publication Version Policy E6A 'New workspace within mixed use development'. This makes clear that providing new workspace within mixed use development does not apply to areas covered by Policies E4 'Avonmouth Industrial Area and Bristol Port' and E5 'Industry and Distribution Areas' or to other locations to which specific policy provisions apply. This comment is considered to be adequately addressed in Local Plan Publication Version Policy E6A, for example with reference to workspace provided or retained being suitable for a wide range of sectors and types of premises.

Digital Connectivity

Proposal EC 4: Digital connectivity and inclusion

Table 35 - main issues raised on Proposal EC 4: Digital connectivity and inclusion and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Objection to imposition of standards higher than existing building standards and contrary to Written Ministerial Statement. 	<ul style="list-style-type: none"> Written Ministerial Statement refers to changes made to system by which technicalities of design and construction are set and does not refer to building standards for digital connectivity, thus does not apply

Main issues raised	How they were addressed
	to Local Plan Publication Version Policy E8 'Digital connectivity and inclusion'.

Health and well being

Table 36 - main issues raised on Health and well being and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Greater emphasis sought on: <ul style="list-style-type: none"> ○ green amenity spaces; ○ nurturing nature; ○ sustainable/active travel; ○ child friendly spaces and play. • Bristol Avon Catchment Partnership thought focus should be on reducing health inequalities by ensuring wider determinants of health are addressed in integrated and co-ordinated way. Development proposals should be expected to assess potential impacts and opportunities on the health and wellbeing of communities, in order to identify mitigation and reduce inequalities, e.g. through use of Health Impact Assessments. 	<p>Addressed in Local Plan Publication Version Policy HW2B 'Health and development'.</p> <p>This seeks to ensure development contributes to reducing causes of ill health, improves health and reduces health inequalities by addressing adverse health impacts, providing a healthy living environment, promoting and enabling healthy lifestyles and providing good access to health facilities and services.</p> <p>Health Impact Assessments will be required to accompany large development proposals or where a significant impact on health and wellbeing is likely. These will identify any negative impacts and mitigation measures.</p> <p>The council's practice note 'Planning a healthier Bristol: Assessing the health impacts of development' (2013) provides additional guidance for assessing the health impacts of development. The council intends to update this practice note.</p>

Air quality

Proposal HW 1: New development to contribute to delivering the council's Air Quality Action Plan

Table 37 - main issues raised on Proposal HW 1: New development to contribute to delivering the council's Air Quality Action Plan and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More detail required on financial contributions mechanism and projects it would fund. • Lack of justification and evidence that proposal would not affect development viability and delivery. • Effectiveness of proposal questioned as relies on off-site mitigation. 	<ul style="list-style-type: none"> • Approach to planning obligations addressed in Local Plan Publication Version Policy IDC1 'Development contributions and CIL' and Planning Obligations supplementary planning document. • Local Plan Publication Version supported by viability assessment. • Local Plan Publication Version Policy HW2 'Air quality' seeks the provision of both on- and off-site mitigation measures where necessary. The acceptability of any off-site provision will be assessed according to the policies of the local plan on a case by case basis.

Proposal HW 2: Controlling potentially polluting development

Table 38 - main issues raised on Proposal HW 2: Controlling potentially polluting development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Off-site solutions may not help as pollution impacts are localised. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy HW2 'Air quality' seeks provision of both on- and off-site mitigation measures where necessary. The acceptability of any off-site provision will be assessed according to the policies of the local plan on a case by case basis.

New protection for open space

Table 39 - main issues raised on New protection for open space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Greater clarity sought on which sites would be protected. • Concern that approach would result in overall reduction in green space and levels of protection. • Bristol Avon Catchment Partnership and Wessex Water: <ul style="list-style-type: none"> ○ Requested clarity on criteria to be used to assess whether land may no longer be required as open space. ○ Sought an approach which recognises increasing importance of open space to mitigate climate change impacts. • Environment Agency considered that: <ul style="list-style-type: none"> ○ Proposals could be more aspirational with a target to increase quantum of open space. ○ Insufficient reference had been given to value of watercourses and wetlands, and their enhancement. 	<ul style="list-style-type: none"> • Detail provided in 2019 ‘New Protection for Open Space – Consultation’ document. • Approach considered appropriate for reasons set out in document. • Bristol Avon Catchment Partnership and Wessex Water comments: <ul style="list-style-type: none"> ○ Information on approach to open space designation provided in 2019 ‘New Protection for Open Space – Consultation’ document. ○ Importance of open space in climate mitigation referenced in 2018 document. Approach maintained for Local Plan Publication Version’s ‘Biodiversity and Green Infrastructure’ chapter. • Environment Agency comments: <ul style="list-style-type: none"> ○ 2018 consultation identified that a fifth of the city’s land area is given over to various forms of open space and that this overall proportion would be maintained in the Local Plan Review. This is the approach of the Local Plan Publication Version and is considered appropriate given the other aims and objectives of the plan, particularly around meeting the city’s strategic development needs. ○ Proposals were developed for subsequent consultation documents. Issue covered in Local Plan Publication Version’s ‘Biodiversity and Green Infrastructure’ chapter;

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Sport England considered that: <ul style="list-style-type: none"> ○ Draft proposal did not adequately protect recreation and sport spaces including playing pitches. ○ Reference be made to their Active Design principles. ○ Existing sports facilities (outdoor) should be protected. ○ Community use of education sites should be promoted. 	<p style="text-align: right;">for example, Policy BG5 ‘Biodiversity and access to Bristol’s waterways’.</p> <ul style="list-style-type: none"> • Sport England comments: <ul style="list-style-type: none"> ○ Approach considered appropriate for reasons set out in consultation document. Proposals were developed in subsequent consultations. Issue addressed in Local Plan Publication Version’s ‘Biodiversity and Green Infrastructure’ chapter. ○ Local Plan Publication Version Policy HW2B ‘Health and development’ sets out expectation that development will contribute to providing healthy lifestyles. Policy will be implemented with guidance in council’s practice note ‘Planning a healthier Bristol: assessing the health impacts of development’. This includes reference to Sport England (485)’s Active Design principles. ○ Issue covered by Local Plan Publication Version Policy CF2 ‘Retention of community facilities’. ○ Local Plan Publication Version Policy CF1 ‘Provision of community facilities’ expects community facilities to be accessible and open to all members of the community. Educational establishments will consider whether community use of their sites is appropriate.

Proposal HW 3: Specially Protected Local Green Space

Table 40 - main issues raised on Proposal HW 3: Specially Protected Local Green Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency concerned that criteria for Specially Protected Local 	<ul style="list-style-type: none"> • Approach considered appropriate, reflecting the strong protections afforded to Local Green Spaces by national planning policy.

Main issues raised	How they were addressed
<p>Green Space designation excludes Local Wildlife Sites, Sites of Nature Conservation Interest or the value of watercourses.</p> <ul style="list-style-type: none"> • A number of sites were submitted for designation as Specially Protected Local Green Space under HW3. • Lack of clarity on differences between definitions and protections for sites subject to Proposal HW 3 ‘Specially Protected Local Green Space’ and Proposal HW 4 ‘Reserved Open Space’ and how they would be assessed for designation. 	<ul style="list-style-type: none"> • Sites assessed and results set out in 2019 ‘New Protection for Open Space – Consultation’ document. • Detail provided in 2019 ‘New Protection for Open Space – Consultation’ document.

Proposal HW 4: Reserved Open Space

Table 41 - main issues raised on Proposal HW 4: Reserved Open Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of clarity on differences between definitions and protections for sites subject to Proposal HW 3 ‘Specially Protected Local Green Space’ and Proposal HW 4 ‘Reserved Open Space’ and how they would be assessed for designation. 	<ul style="list-style-type: none"> • Detail provided in 2019 ‘New Protection for Open Space – Consultation’ document.

Takeaways

Proposal HW 5: Health impact of takeaways

Table 42 - main issues raised on Proposal HW 5: Health impact of takeaways and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Increase distance criteria further. • Lack of evidence to justify proposed approach. • Proposal may have potential harmful impact on centre viability. • Concern focus on Use Class A5 uses may not capture unhealthy non-A5 uses. 	<ul style="list-style-type: none"> • Distance criteria approach maintained for Local Plan Publication Version Policy HW3 'Takeaways'. Supporting text to policy identifies there may be cases where a proposed takeaway located beyond 400m may not be acceptable due to other local factors which would result in the outlet being likely to have a harmful influence on children's behaviour. • Support for approach in national planning policy and guidance as well as local health-related objectives. • Approach considered to be appropriate, responding to national planning policy and local health-related objectives. • Local Plan Publication Version Policy HW3 'Takeaways' amended so that it is also applicable to proposals for mixed Use Class A3 and A5 schemes.

Resilience

Climate change

Proposal RES 1: Meeting more of development's energy needs sustainably

Table 43 - main issues raised on Proposal RES 1: Meeting more of development's energy needs sustainably and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Should be more supportive of renewable energy generation including wind. • Lack of viability-testing and evidence to justify approach. • SSE Generation Limited thought proposal should 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy NZC5 'Renewable energy and energy efficiency' sets out a supportive stance for renewable energy development across the city and of all scales. The policy specifically identifies Avonmouth and its environs as being particularly well suited to such development, including wind. • Local Plan supported by viability assessment. • The council supports the repowering of existing renewable energy generation,

Main issues raised	How they were addressed
consider applications for repowering existing plant, wind farm extensions and remove time-limit conditions from planning permissions, plus support new gas development.	including wind turbines. These would be addressed through Policy NZC5 where planning permission is required. The council does not support the provision of new gas fired energy infrastructure in the city as part of the transition towards net zero.

Proposal RES 2: Updating the approach to heating systems

Table 44 - main issues raised on Proposal RES 2: Updating the approach to heating systems and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of detailed wording. • Need to reference renewable sources. 	<ul style="list-style-type: none"> • The suite of NZC policies has been extensively developed since the 2018 consultation. They are highly detailed policies now which set out specific requirements relating to heating systems. Publication Version Policy NZC2 ‘Net zero carbon development – operational carbon’ is the most relevant policy for this planning issue. • The council’s proposed heat hierarchy prioritises connections to the city’s expanding heat network. This network is low carbon and will undergo further transition away from fossil fuel powered heating by 2030. Where connections to the heat network are not practicable, communal or individual renewable heating which is fossil fuel free will be expected to be installed.

Proposal RES 3: Supporting new sustainable design standards

Table 45 - main issues raised on Proposal RES 3: Supporting new sustainable design standards and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Reference could be made to Building with Nature standards and use of 	<ul style="list-style-type: none"> • The council has prepared a suite of biodiversity and green infrastructure policies to address the ecological emergency. Local Plan Publication Policy BG1 ‘Green infrastructure and biodiversity in new

Main issues raised	How they were addressed
recycled content building products.	development' requires major development to achieve specific standards for urban greening, and includes Building with Nature as an optional standard.

Proposal RES 4: Stronger policies for adapting to climate change

Table 46 - main issues raised on Proposal RES 4: Stronger policies for adapting to climate change and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More emphasis needed on: <ul style="list-style-type: none"> ○ Tree planting; ○ Adaptation of existing development; ○ SUDs; ○ Identifying renewable energy zones. • Understanding impacts on development viability needed. 	<ul style="list-style-type: none"> • The new local plan includes a policy which addresses tree replacement using a standard based on the age/dimension of trees lost. This standard is an improvement on existing local plan policy. <p>The suite of NZC policies also recognises the role of reusing existing buildings wherever possible, including due to their embodied carbon. Although predominantly concerned with new development, it also includes policy provision that supports the adaptation of development to a changing climate, with regard to issues such as overheating and more extreme weather.</p> <p>Local Plan Publication Version Policy NZC5 'Renewable energy and energy efficiency' identifies Avonmouth as an area particularly well suited to renewable energy generation, but is also supportive of proposals across the city.</p> <ul style="list-style-type: none"> • Local Plan supported by viability assessment.

Food Systems

Table 47 - main issues raised on Food Systems and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Stronger emphasis needed on: 	The new local plan contains a suite of proposed policies that address food sustainability.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Protecting allotments, food growing sites, best and most versatile soil, and the St Philip's Marsh Wholesale Market. ● Food growing should be a strategic objective. 	<p>Publication Version Policies FS1-2 aim to increase the provision of food growing space, both allotments and in new development. Policy FS3 specifically calls for the protection of existing food growing uses in the city, including allotments which are already afforded significant protections in statute.</p>

Proposal RES 5: Stapleton Allotments and Holdings

Table 48 - main issues raised on Proposal RES 5: Stapleton Allotments and Holdings and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● All allotments should receive similar protection. 	<ul style="list-style-type: none"> ● All allotments are subject to strict statutory protections. The new local plan builds on this with Publication Version Policy FS3 'The protection of existing food growing enterprises and allotments' which protects food growing uses in the city, including allotments.

Local plan policies proposed to be retained

Table 49 - main issues raised on Local plan policies proposed to be retained and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● BCS7 'Centres and Retailing': Support retention but suggest it should include Imperial Retail Park, Hartcliffe Way as a district centre. ● BCS12 'Community Facilities': policy needs revising with more emphasis on community and cultural facilities, which should be required for each major development. 	<ul style="list-style-type: none"> ● Existing out-of-centre developments do not constitute centres. ● Local Plan Publication Version contains two policies which update BCS12: Policy CF1 'Provision of community facilities' and Policy CF2 'Retention of community facilities'.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • BCS16 ‘Flood Risk and Water Management’: Revise policy to include specific reference to requirement to ensure no adverse impact on third party interests resulting from new development or associated mitigation measures, in accordance with NPPF. • BCS19 ‘Gypsies and Travellers and Travelling Showpeople’: Evidence base outdated and policy will need updating. • DM21 ‘Development of private gardens’: Object to current policy as it is used to permit development and loss of green infrastructure. • DM23 ‘Transport Development Management’: <ul style="list-style-type: none"> ○ Update should reflect Joint Spatial Plan. ○ Parking approach should vary by area as per London Plan and its use of Public 	<p>Introductory text to these policies makes reference to how they include cultural centres and venues.</p> <p>For major development proposals which are likely to generate a need for new or extended community facilities, Policy CF1 expects schemes to provide at least 10% of ground floor space suitably fitted out for the use of community and/or cultural organisations and groups and made available at an affordable rent.</p> <ul style="list-style-type: none"> • BCS16 replaced by Local Plan Publication Version Policy FR1 ‘Flood risk and water management’, which is considered to be in accordance with national planning policy. • BCS19 replaced by Local Plan Publication Version Policy H10 ‘Planning for traveller sites’. • DM21 replaced by Local Plan Publication Version Policy BG6 ‘Private gardens’. • DM23 ‘Transport Development Management’: <ul style="list-style-type: none"> ○ Joint Spatial Plan withdrawn in 2020. Approach of DM23 reflected in Local Plan Publication Version Policy T3A ‘Transport development management’. ○ Approach to parking set out in Local Plan Publication Version Policy T4A ‘Parking, servicing and the provision

Main issues raised	How they were addressed
<p>Transport Accessibility Levels.</p> <ul style="list-style-type: none"> • Site Allocations and Development Management Policies Local Plan Appendix A Parking Standards Schedule: <ul style="list-style-type: none"> ○ Need references to electric vehicle charging. ○ New dwellings must include adequate parking spaces. • DM29 ‘Shopfronts, Signage and External Installations’: Policy required on outdoor advertising. • BCAP11 ‘University and Hospital Development’: Explicit support for hospital and ancillary hospital development within defined hospital precinct is needed. • BCAP26 ‘Old City - Reducing Traffic’: Policy needs to be strengthened. • BCAP 29 ‘Car and Cycle Parking’: Policy needs to be strengthened. Parking policy should vary by area. • BCAP 30 ‘Pedestrian Routes’: Network is unambitious. Needs to be expanded and deadlines set for improvements. 	<p>of infrastructure for electric vehicles’, which will be supported by guidance in the Transport Supplementary Planning Document.</p> <ul style="list-style-type: none"> • Site Allocations and Development Management Policies Local Plan Appendix A Parking Standards Schedule: <ul style="list-style-type: none"> ○ Approach to electric vehicle infrastructure and parking set out in Local Plan Publication Version Policy T4A ‘Parking, servicing and the provision of infrastructure for electric vehicles’, which will be supported by guidance in the Transport Supplementary Planning Document. • Addressed by Local Plan Publication Version Policy AD1 ‘Advertisements’. • Addressed in Local Plan Publication Version Policy DS1 ‘Bristol City Centre’. • Addressed in Local Plan Publication Version Policy DS1A ‘Bristol City Centre – Broadmead, Castle Park and the Old City’. • Approach to parking addressed in Local Plan Publication Version Policy T4A ‘Parking, servicing and the provision of infrastructure for electric vehicles’, which will be supported by guidance in the Transport Supplementary Planning Document. • BCAP30 has been incorporated into a number of policies in the Local Plan Publication Version. For example: <ul style="list-style-type: none"> ○ In the Central Bristol section of the ‘Development Strategy’ chapter, each

Main issues raised	How they were addressed
<ul style="list-style-type: none"> BCAP32 'Quayside Walkways': Some progress has been made but standards and deadlines should now be set. 	<p>area policy makes reference to development including measures to secure public access and routes for walking.</p> <ul style="list-style-type: none"> Policy T2 'Transport infrastructure improvements' highlights the provision of safe and attractive walking routes and references the plans and strategies which will deliver these enhancements. Policy T3A 'Transport development management' expects development to provide for pedestrians including, where appropriate, enhancing the pedestrian network. Policy T6 'Active travel routes' will also ensure that the function and amenity of Active Travel Routes is protected. This is supported by the expectation that proposals adjacent to the Active Travel Route network should, where possible, provide connections with existing or proposed routes. <ul style="list-style-type: none"> BCAP32 replaced by Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.

Local plan policies proposed to be no longer retained

Table 50 - main issues raised on Local plan policies proposed to be no longer retained and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> BCS1 'South Bristol': Object as policy emphasises improvements to pedestrian, cycling and public transport facilities. 	<ul style="list-style-type: none"> BCS1 replaced by South Bristol policies in the Local Plan Publication Version's 'Development Strategy' chapter which also contain expectations for transport infrastructure and access improvements.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • BCS2 ‘Bristol City Centre’: Object as policy emphasises improvements to pedestrian, cycling and public transport facilities. • BCS8 ‘Delivering a Thriving Economy’: Review policy to reflect market conditions re office floor space retention. • BCS10 ‘Transport and Access Improvements’: <ul style="list-style-type: none"> ○ Objection to removal of policy. ○ Should be revised to better control cars and heavy vehicles and prevent shared spaces. ○ Needs amending in reference to the Joint Transport Strategy and Joint Spatial Plan. • DM12 ‘Retaining Valuable Employment Sites’: Object to the loss of DM12, which should focus on preventing the loss of employment space. • BCAP41 ‘The Approach to Harbourside’: Object to loss, should be replaced by policy focusing on protection of and promotion of economic regeneration through tourism development in the Harbourside area. 	<ul style="list-style-type: none"> • BCS2 replaced by Central Bristol policies in the Local Plan Publication Version’s ‘Development Strategy’ chapter which also contain expectations for transport infrastructure and access improvements. • BCS8 replaced by policies in the ‘Economy and inclusive growth’ chapter of the Local Plan Publication Version. This includes Policy E2 ‘Economic development land strategy’ which contains an updated approach to the provision and retention of workspace. • BCS10 ‘Transport and Access Improvements’: <ul style="list-style-type: none"> ○ Replaced by Local Plan Publication Version Policy T2 ‘Transport infrastructure improvements’. This provides an updated approach for delivering transport infrastructure enhancements. ○ Publication Version Policy T3A ‘Transport development management’ sets out the transport considerations development proposals should address. ○ Joint Spatial Plan withdrawn in 2020. • DM12 replaced by policies in ‘Economy and inclusive growth’ chapter of the Local Plan Publication Version. These include policies for the provision and retention of workspace for key sectors. • Approach to tourism-related development set out in Local Plan Publication Version policies DS1 ‘Bristol City Centre’ and SSE1 ‘Supporting Bristol’s Centres - network and hierarchy’.

Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation (2019)

In March 2019 the council published the ‘Bristol Local Plan Review – Draft Policies and Development Allocations – Consultation’ document for comment. A total of 922 responses were received.

The main issues raised and how they were addressed in the Local Plan are set out in the tables below.

Vision: Building a better Bristol

Table 51 - main issues raised on Vision: Building a better Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Insufficiently radical to address climate change emergency. Priority of plan should be target of carbon neutrality by 2030. • Too housing delivery focussed. • Specific reference to / more emphasis needed on: protecting and increasing tree canopy cover; employment land provision, particularly in South Bristol; understanding barriers to access open space and creating safer spaces for women and children; expression of housing targets as minimum figures; addressing gentrification; provision of social housing; South Bristol, to address north/south economic divide in city; updated housing numbers if arising from Joint Spatial Plan examination; minimising 	<p>The Local Plan Publication Version contains a positive vision for the future development of Bristol looking ahead to 2050.</p> <p>It addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met.</p> <p>The vision is supported by a set of aims and objectives. These provide more detail on how the Local Plan will address the issues identified in the vision. References are provided to chapters in the Local Plan which contain policies with a particular focus on responding to the aims and objectives.</p> <p>The key matters raised in the 2018, 2019 and 2022 consultations have informed the vision, objectives, aims and / or policies of the Local Plan Publication Version.</p>

Main issues raised	How they were addressed
<p>impacts of development for health and wellbeing; addressing environmental impacts, e.g. advocate a 'regenerative city' approach incorporating green roofs, street trees and pollinators; setting out strategic priorities; the council's Social Value Policy; and meaningful community engagement.</p>	

Development strategy

Table 52 - main issues raised on Development strategy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Should better reflect climate change emergency declaration, with more focus needed on environmental over social and economic objectives. • Insufficient emphasis on providing employment land to support level of housing proposed, including lack of evidence to inform employment land requirements. • Increase emphasis on children, including advocating 'child friendly city' principles regarding play, design and community involvement. • Tackling inequality should be included, with greater focus on a holistic approach to improving deprived areas. 	<ul style="list-style-type: none"> • Local Plan Publication Version contains an Aims and Objectives section with tackling the climate emergency referenced as one of four main objectives of the plan. Objectives will be pursued mutually. • Addressed in Local Plan Publication Version Policy E2 'Economic development land strategy'. • Local Plan Publication Version focuses on ensuring new development is inclusive. This is specifically referred to in the plan's vision, aims, objectives and many of its policies. • Local Plan Publication Version's vision section includes reference to substantially narrowing inequality in the city. A number of policies support this, for example Policy E1 'Inclusive economic development'. This

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Strategy inconsistent with Bristol’s 24-hour economy; i.e. how will strategy support night-time economy and events / festival culture. • References also needed to: <ul style="list-style-type: none"> ○ Supporting opportunities for urban farming. ○ Making use of unused and derelict buildings to create new housing. ○ Protecting suburban gardens from development. • Separate concerns expressed that number of homes to be delivered is too high or too low. • Transport: <ul style="list-style-type: none"> ○ More reference needed to encouragement of walking as a mode of transport. ○ Need for transport infrastructure improvements prior to major development. • Urban living: 	<p>seeks to ensure new development removes barriers to employment for local residents, facilitates skills development and supports employment initiatives.</p> <ul style="list-style-type: none"> • Addressed in Local Plan Publication Version Policy SSE3 ‘Supporting Bristol’s evening, night-time and culture economy’. • Requests for additional references: <ul style="list-style-type: none"> ○ Addressed by Local Plan Publication Version policies FS3 ‘The protection of existing food growing enterprises and allotments’ and Policy GI4 ‘Stapleton Allotments and Holdings – Food Growing Local Green Space’. ○ Covered by Publication Version Policy UL1 ‘Effective and efficient use of land’. ○ Addressed by Publication Version Policy BG6 ‘Development of Private Gardens’. • Number of homes set out in Local Plan Publication Version Policy H1 ‘Delivery of new homes – Bristol’s housing requirement’. • Transport: <ul style="list-style-type: none"> ○ Addressed in Local Plan Publication Version policies T1 ‘Development and transport policies’ and T6 ‘Active travel routes’. ○ Addressed in Publication Version Policy T2 ‘Transport infrastructure improvements’. • Urban living:

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Definition unclear and inconsistent. ○ Strategy needed to protect suburban gardens for climate change mitigation, wildlife and biodiversity. ○ High density housing approach incompatible with different housing types needed. ○ Adjacent councils should take greater proportion of Bristol’s housing need. ○ Highways England thought more consideration was needed on where high density new development will be located so that traffic and transport impacts can be assessed. ● Natural England considered that while development of brownfield sites at higher densities can be an efficient use of land, these sites can be important for wildlife. 	<ul style="list-style-type: none"> ○ More detail provided in policies in Local Plan Publication Version’s Urban Living chapter, supported by Policy DC1 ‘Liveability in residential development including space standards, aspect and private outdoor space’. ○ Approach to this issue set out in Local Plan Publication Version Policy BG6 ‘Development of Private Gardens’. ○ A number of Local Plan Publication Version policies will be used to ensure an appropriate housing mix is achieved. This includes the various area policies within the ‘Development Strategy’ chapter and Policy H4 ‘Housing type and mix’. ○ The approach to meeting city’s housing need explained in Local Plan Publication Version’s ‘Housing’ chapter. ○ Addressed in suite of policies in Transport chapter of Local Plan Publication Version, including policies T1 ‘Development and transport policies’ and T2 ‘Transport infrastructure improvements’. ● It is considered that Local Plan Publication Version’s Policy BG2 ‘Nature Conservation and Recovery’ will ensure any importance will be considered and addressed in determination of planning applications.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Bristol Water noted that growth could lead to significant increase in water demand and this will need to be considered in water resource management plans. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy NZC1 ‘Climate change, sustainable design and construction’ seeks to address this issue by expecting new residential development to apply a higher standard of water efficiency than national building regulations.

Central Bristol

Draft Policy DS1: Bristol City Centre

Table 53 - main issues raised on Draft Policy DS1: Bristol City Centre and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Retail: <ul style="list-style-type: none"> ○ Approach to retail provision unclear, e.g. compatibility with retained Bristol Central Area Plan Policy BCAP13 questioned. Review and update of evidence base suggested. • Workspace provision: <ul style="list-style-type: none"> ○ Concern over type of jobs to be provided, i.e. that they should match skills of people living in central Bristol. 	<ul style="list-style-type: none"> • Retail: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy DS1 ‘Bristol City Centre’ provides an appropriate strategic approach, identifying retail uses as a key part of the mix of development expected in this location. It is supported by Policy DS1A ‘Bristol City Centre – Broadmead, Castle Park and the Old City’ which provides more detail on the expectations for the location of new retail development. Further guidance is provided in policies in the Publication Version’s chapter on ‘Centres, shopping, and the evening economy’, including policies SSE1 ‘Supporting Bristol’s Centres - network and hierarchy’ and SSE2 ‘Development in Bristol’s centres’. • Workspace provision: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy DS1 ‘Bristol City Centre’ advocates a mix of uses to reflect the diversity of city centre. This is expected to lead to a wide variety of employment opportunities.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Managing student accommodation: <ul style="list-style-type: none"> ○ differing views received between those seeking more restrictions and those questioning appropriateness of any restrictions. • Flood risk: <ul style="list-style-type: none"> ○ Environment Agency thought flood risk needed to be addressed strategically before development can come forward in this location. • Development amounts: <ul style="list-style-type: none"> ○ More clarity sought on amount of employment land and residential development to be provided. • Insufficient reference to the Stokes Croft and its 	<ul style="list-style-type: none"> • Managing student accommodation: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy DS1 'Bristol City Centre' maintains the 2019 draft approach that purpose-built student accommodation will be carefully managed and directed towards identified areas in the city centre, with reference to Policy H7 'Managing the development of purpose-built student accommodation'. • Flood risk: <ul style="list-style-type: none"> ○ Supporting text to Local Plan Publication Version Policy DS1 'Bristol City Centre' acknowledges flood risk in this location and explains that this risk will be managed to ensure the city centre can continue to flourish and grow. Publication Version Policy FR1 'Flood risk' provides more detail on the approach to this issue while Policy FR2 'Bristol Avon Flood Strategy' sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy. • Development amounts: <ul style="list-style-type: none"> ○ An estimate of the number of new homes expected to be provided in the City Centre Development and Delivery Plan area is provided in supporting text to Local Plan Publication Version Policy DS1 'Bristol City Centre'. Local Plan Publication Version Policy E2 'Economic development land strategy' provides the strategic policy approach to the scale and location of new workspace to be provided over the plan period. • Approach to Stokes Croft addressed in Local Plan Publication Version Policy SSE2

Main issues raised	How they were addressed
<p>issues and opportunities such as heritage and socio-economic deprivation. Area should be identified for mixed-use development.</p> <ul style="list-style-type: none"> • Commitment to zero carbon development needed along with presumption against parking provision in city centre developments. 	<p>‘Development in Bristol’s centres’. This sets out that the emphasis of new development will be on retaining a mix of uses to maintain the location’s character and sustainability.</p> <ul style="list-style-type: none"> • Local Plan Publication Version’s approach is set out in policies in the ‘Net zero and climate’ chapter. Approach to car parking provision is addressed in Local Plan Publication Version policy T4A ‘Parking, servicing and the provision of infrastructure for electric vehicles’, amongst other policies.

Draft Policy DS2: Bristol Temple Quarter

Table 54 - main issues raised on Draft Policy DS2: Bristol Temple Quarter and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Workspace provision: <ul style="list-style-type: none"> ○ Concern over type of jobs to be provided, i.e. that they should match skills of people living in central Bristol. ○ Should specify more Research and Development employment uses to be provided. ○ Requirement to provide workspaces may jeopardise new development on viability grounds. • Temple Island: <ul style="list-style-type: none"> ○ Requirement that masterplan will guide development 	<ul style="list-style-type: none"> • Workspace provision: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy DS2 ‘Bristol Temple Quarter’ advocates a mix of uses. This is expected to lead to a wide variety of employment opportunities. ○ A flexible approach is proposed which could include Research and Development uses. ○ Policy DS2 ‘Bristol Temple Quarter’ considered to be an appropriate approach, advocating a mix of uses and reflecting the Bristol Temple Quarter Development Framework, approved by the council in 2023. • Temple Island: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy DS2 ‘Bristol Temple Quarter’ makes clear that this area should be

Main issues raised	How they were addressed
<p>questioned as could delay delivery of schemes.</p> <ul style="list-style-type: none"> • Transport and infrastructure improvements: <ul style="list-style-type: none"> ○ Clarity sought on how these will be delivered. • Flood risk: <ul style="list-style-type: none"> ○ Unreasonable to expect developers to carry out sequential test as this should be undertaken by the council prior to allocating a site; ○ Environment Agency (465) thought flood risk needed to be addressed strategically before development can come forward. Policy needs strengthening as most of area is at high risk of flooding. Sequential and 	<p>developed for a variety of uses with proposals to accord with the Bristol Temple Quarter Development Framework.</p> <ul style="list-style-type: none"> • Transport and infrastructure improvements: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy DS2 ‘Bristol Temple Quarter’ makes reference to Temple Meads station regeneration plans. Other improvements will be delivered as part of new development schemes in accordance with Publication Version Policy IDC1 ‘Development contributions and CIL’ or through separately delivered plans and programmes referred to in Publication Version Policy T2 ‘Transport infrastructure improvements’. • Flood risk: <ul style="list-style-type: none"> ○ Approach considered appropriate and supported by national planning policy. Local Plan Publication Version Policy DS2 ‘Bristol Temple Quarter’ supported by Policy FR1 ‘Flood risk’ which provides more detail on the approach to this issue. ○ Local Plan Publication Version Policy DS2 ‘Bristol Temple Quarter’ is supported by Policy FR1 ‘Flood risk’ which provides more detail on the approach to this issue. Policy FR2 ‘Bristol Avon Flood Strategy’ sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy.

Main issues raised	How they were addressed
<p>Exception tests will need be applied.</p> <ul style="list-style-type: none"> • Reference needed to Temple Quarter Enterprise Zone Spatial Framework. • Development amounts: <ul style="list-style-type: none"> ○ More clarity sought on amount of employment land and residential development to be provided. • Importance of involving community groups in design of schemes and masterplanning. • Concern that retail and leisure uses might undermine Bristol Shopping Quarter. • Other uses suggested for inclusion in policy: 	<ul style="list-style-type: none"> • References included within Local Plan Publication Version Policy DS2 ‘Bristol Temple Quarter’. • Development amounts: <ul style="list-style-type: none"> ○ Estimate of number of new homes expected to be provided set out in Publication Version Policy DS2 ‘Bristol Temple Quarter’. Policy DS2 expects development to accord with the Bristol Temple Quarter Development Framework, which provides more details on workspace provision. This is supported by Local Plan Publication Version Policy E2 ‘Economic development land strategy’ which sets out the strategic policy approach to scale and location of new workspace to be provided over plan period. • Policy DS2 expects development to accord with the Bristol Temple Quarter Development Framework, the preparation of which involved a wide variety of community engagement methods. Local Plan Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’ expects major development applications to show how their schemes have been informed by early, proactive and effective community engagement. • Policy makes clear that any retail and leisure uses will be complementary to main uses proposed. This is supported by Local Plan Publication Version Policy SSE2 ‘Development in Bristol’s centres’ which states that Bristol Shopping Quarter will be the priority location for major shopping facilities. • Policy DS2 sets out an approach to the provision of key uses appropriate to this

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ urban farming. ○ social enterprises for high-tech solutions. ○ night clubs. ○ tourism. ● Natural England thought more specific measures regarding green infrastructure could be included. 	<p>location and reflecting emerging development proposals. Any proposals for the uses suggested will be considered against relevant planning policies and considerations.</p> <ul style="list-style-type: none"> ● This issue is considered to be adequately addressed with appropriate references in the policy, for example that development should include new and enhanced green infrastructure. This will be supported by application of the suite of policies in the Local Plan Publication Version’s ‘Biodiversity and Green Infrastructure’ chapter.

Draft Policy DS3: St Philip’s Marsh

Table 55 - main issues raised Draft Policy DS3: St Philip’s Marsh and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Infrastructure and transport: <ul style="list-style-type: none"> ○ Need to consider existing commuter routes and electricity / energy infrastructure. ● Flood Risk: <ul style="list-style-type: none"> ○ Environment Agency considered policy should acknowledge high risk of fluvial as well as tidal flooding. Unable to support policy approach without sequential testing and suitable flood risk 	<ul style="list-style-type: none"> ● Infrastructure and transport: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy DS3 ‘St Philip’s Marsh’ expects development to accord with the Bristol Temple Quarter Development Framework, which addresses existing infrastructure and transport issues as well as land use characteristics. ● Flood Risk: <ul style="list-style-type: none"> ○ Publication Version Policy DS3 ‘St Philip’s Marsh’ makes appropriate reference to flood risk issues. This is supported by Publication Version Policy FR1 ‘Flood risk’ which provides more detail on the approach. Policy FR2 ‘Bristol Avon Flood Strategy’ sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy.

Main issues raised	How they were addressed
<p>management strategy.</p> <ul style="list-style-type: none"> • Workspace: <ul style="list-style-type: none"> ○ Clarify how proposed increase in job numbers and enhanced business diversity will be tracked. ○ Requirement to provide workspace may jeopardise new development on viability grounds. ○ Importance of existing workspace in area, such as recycling operations and railway depot. • Reference needed to Temple Quarter Enterprise Zone Spatial Framework. • To guide development, clarity needed on specific allocations or a phasing map, along with timescales for masterplan production and its planning status. • Flexibility needed to recognise that specific sites can come forward in advance of the masterplan. • Development amounts: 	<ul style="list-style-type: none"> • Workspace: <ul style="list-style-type: none"> ○ Appropriate monitoring of the Local Plan’s key policies will be undertaken and published in the Authority’s Monitoring Report. This will inform the review of the Local Plan and the effectiveness of its policies which will take place within five years of plan adoption. ○ Policy DS3 ‘St Philip’s Marsh’ considered to be an appropriate approach, advocating a mix of uses and reflecting the Bristol Temple Quarter Development Framework, approved in 2023. ○ This is considered to be adequately addressed with the policy’s references to development ensuring the retention, refurbishment, intensification and innovative reincorporation of workspace in this location. • References included within Publication Version Policy DS3 ‘St Philip’s Marsh’. • Publication Version Policy DS3 ‘St Philip’s Marsh’ no longer makes reference to a masterplan. Instead development is expected to accord with the Bristol Temple Quarter Development Framework, approved in 2023. • Publication Version Policy DS3 ‘St Philip’s Marsh’ no longer makes reference to a masterplan. Instead development is expected to accord with the Bristol Temple Quarter Development Framework, approved in 2023. • Development amounts:

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ More clarity sought on amount of employment land and residential development to be provided. ● Appropriateness of tall buildings, including building heights, should be specified. ● Include Avonmeads Retail Park within policy area. ● Rather as extension to Temple Quarter, area should be seen as part of Lawrence Hill, Barton Hill and cater for needs of residents in those locations. ● North west St Philip’s Marsh: <ul style="list-style-type: none"> ○ Should specify appropriateness of mixed-use development that optimises use of river. ○ Should support purpose-built student accommodation given proximity to University of Bristol’s Temple Quarter Enterprise Campus. 	<ul style="list-style-type: none"> ○ Publication Version Policy DS3 ‘St Philip’s Marsh’ expects development to be of a form, scale and density consistent with its central urban location. It also expects development to accord with the Bristol Temple Quarter Development Framework. This provides more detail to guide appropriate development proposals. ● Tall buildings not specifically referred to in draft policy and this is maintained in Publication Version Policy DS3 ‘St Philip’s Marsh’. Any tall building proposals will be considered with reference to Policy DC2 ‘Tall buildings’ and all other relevant policies. ● Boundary of draft policy area considered appropriate and maintained for Publication Version Policy DS3 ‘St Philip’s Marsh’. ● Connections to adjoining communities addressed in Publication Version Policy DS3 ‘St Philip’s Marsh’. For example, reference is made to development demonstrating measures to create a neighbourhood that is welcoming to all, especially in respect of those communities in adjoining areas. ● North west St Philip’s Marsh: <ul style="list-style-type: none"> ○ Text added to Publication Version Policy DS3 ‘St Philip’s Marsh’ to ensure development along Feeder Road addresses and enhances its canal-side environment. ○ Support for purpose-built student accommodation is referenced in Publication Version Policy DS3 ‘St Philip’s Marsh’. This is supported by Publication Version Policy H7 ‘Managing the development of purpose-built student accommodation’.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Clarification sought on boundary of area and meaning of ‘other more intensive forms of use appropriate to a location adjacent to the city centre’. ● South of Albert Road: <ul style="list-style-type: none"> ○ Should specify appropriateness of mixed-use development that optimises use of river. ○ Clarification sought on boundary of area. ○ Concern about potential loss of significant recycling industry and impact on local employment opportunities. ● Feeder canal: 	<ul style="list-style-type: none"> ○ Boundary considered to be clear with reference to the map provided with Publication Version Policy DS3 ‘St Philip’s Marsh’ plus changes made to the Publication Version which now refers to ‘north west St Philip’s Marsh’, ‘South St Philip’s Marsh’ and ‘North East St Philip’s Marsh’. Bristol Temple Quarter Development Framework provides more detail. Reference to intensive forms of use provides useful flexibility for an assessment to be made of the appropriateness of specific proposals in this location close to the city centre. ● South of Albert Road: <ul style="list-style-type: none"> ○ Publication Version Policy DS3 ‘St Philip’s Marsh’ amended so area is now referred to as ‘South St Philip’s Marsh’. Policy includes reference to redevelopment of this location addressing and enhancing its river front setting. ○ Boundary considered to be clear with reference to the map provided with Publication Version Policy DS3 ‘St Philip’s Marsh’ plus changes to the Publication Version which now refers to ‘north west St Philip’s Marsh’, ‘South St Philip’s Marsh’ and ‘North East St Philip’s Marsh’. ○ Approach considered appropriate, reflecting the location’s good accessibility credentials and potential to accommodate new mixed-use development in a regenerated area of the city, complementing the adjacent Bristol Temple Quarter. ● Feeder canal:

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Should specify appropriateness of mixed-use development that optimises use of river. ○ Clarification sought on boundary of area. <ul style="list-style-type: none"> ● Eastern St. Philip’s Marsh: <ul style="list-style-type: none"> ○ Clarification sought on boundary of area and whether there would be a presumption against residential-only planning applications in this location. 	<ul style="list-style-type: none"> ○ Text added to Publication Version Policy DS3 ‘St Philip’s Marsh’ to ensure development along Feeder Road addresses and enhances its canal-side environment. ○ Boundary considered to be clear with reference to the map provided with Publication Version Policy DS3 ‘St Philip’s Marsh’ plus changes to the Publication Version which now refers to ‘north west St Philip’s Marsh’, ‘South St Philip’s Marsh’ and ‘North East St Philip’s Marsh’. <ul style="list-style-type: none"> ● Eastern St. Philip’s Marsh: <ul style="list-style-type: none"> ○ Publication Version Policy DS3 ‘St Philip’s Marsh’ has been amended so that this area is now incorporated within ‘North East St Philip’s Marsh’ and ‘South St Philip’s Marsh’. The policy expects development to be one of mixed-uses. Reference is also made to development being in accordance with the Temple Quarter Development Framework, which provides more guidance to inform development proposals.

Draft Policy DS4: Western Harbour

Table 56 - main issues raised on Draft Policy DS4: Western Harbour and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Potential harm to important character, views, heritage assets and features. ● Inappropriate to promote intensive development as not considered to be city centre location in terms of 	<ul style="list-style-type: none"> ● Local Plan Publication Version Policy DS4 ‘Western Harbour’ refers to proposals having regard to the area’s important heritage assets and responding appropriately to key views and landmarks. ● References to intensive development not included in Publication Version Policy DS4. Instead development will be expected to accord with a masterplan, the vision for

Main issues raised	How they were addressed
<p>character and history.</p> <ul style="list-style-type: none"> • Need for effective engagement with local community. • 'Do nothing' approach and other options need to be fully explored. • Clarity needed on capacity of area to accommodate housing given lack of detail over road reconfiguration and land release. • Proposals for tall buildings considered inappropriate. • Concern over impact on existing businesses such as the tannery on Coronation Road, as well as need to retain important maritime industry businesses. • Opposition to proposal for further student accommodation as considered to be an existing high concentration. • Insufficient focus on tourism and leisure, particularly with Bristol Central Area Plan policy 	<p>which was approved in 2022 following public consultation.</p> <ul style="list-style-type: none"> • Publication Version Policy DS4 refers to development being in accordance with a masterplan, the vision for which was approved in 2022 following public consultation. Work continues on the masterplan's preparation with ongoing community engagement. • Justification for the approach set out in introductory text to Publication Version Policy DS4 'Western Harbour'. • Appropriate housing capacity will be considered as part of the master planning process referred to in Publication Version Policy DS4 'Western Harbour'. • Tall buildings not specifically referred to in draft policy and this is maintained in Publication Version Policy DS4 'Western Harbour'. Any tall building proposals will be considered with reference to Policy DC2 'Tall buildings' and all other relevant policies. • Justification for the approach is set out in introductory text to Publication Version Policy DS4 'Western Harbour'. Supporting text to Local Plan Publication Version Policy DS4 'Western Harbour' makes clear that maritime industries at Underfall Yard will continue to be retained. • References to student accommodation not included in Publication Version Policy DS4 'Western Harbour'. Approach to this issue set out in Publication Version Policy H7 'Managing the development of purpose-built student accommodation'. • Approach to tourism-related development set out in Local Plan Publication Version policies DS1 'Bristol City Centre' and SSE1 'Supporting Bristol's Centres - network and

Main issues raised	How they were addressed
<p>BCAP9 not being proposed for retention.</p> <ul style="list-style-type: none"> • Concern about potential loss of open space. • Design proposals too vague. • Historic England thought evidence should be gathered and applied, including views analysis, to demonstrate how strategic form and capacity assumptions have been established. • Environment Agency thought flood risk needed to be addressed strategically before development can come forward. Policy needs strengthening as most of area is at high risk of flooding. Sequential and Exception tests will need be applied. 	<p>hierarchy’.</p> <ul style="list-style-type: none"> • Addressed with references in Publication Version Policy DS4 ‘Western Harbour’ to the retention and provision of high quality public open spaces and development being in accordance with a masterplan. • Addressed in ‘Place principles’ of Publication Version Policy DS4 ‘Western Harbour’. For example, that development should have regard to the area’s important heritage assets, respond appropriately to key views and landmarks and accord with the masterplan being prepared for the area. Policies in the Publication Version’s ‘Design and conservation’ chapter will also be relevant. • It is considered that the Publication Version Policy DS4 ‘Western Harbour’ provides an appropriate approach. It ensures development proposals have regard to the area’s important heritage assets and respond appropriately to key views and landmarks. This is supported with references to the masterplanning process which will be informed by analysis of important heritage issues. Proposals will be expected to accord with the masterplan which results from this process. • Policy DS4 ‘Western Harbour’ sets out approach to flood risk. Publication Version Policy FR1 ‘Flood risk’ provides more detail on the approach while Policy FR2 ‘Bristol Avon Flood Strategy’ sets out how it will be addressed on a strategic basis consistent with the Bristol Avon Flood Strategy.

Draft Policy DS5: Frome Gateway

Table 57 - main issues raised on Draft Policy DS5: Frome Gateway and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern that retail and leisure uses in this area might potentially undermine Bristol Shopping Quarter. • Potential new housing capacity considered to be much higher. • Concern over potential loss of jobs which match local skills. • No green space or key wildlife corridors lost and public rights of way maintained. • Environment Agency sought consultation on the proposed Spatial Framework that addresses the sequential layout of schemes, with development located in Flood Zone 1 wherever possible. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy DS5 'Frome Gateway' amended. Reference now made to retail and leisure development which meets local needs. • Publication Version Policy DS5 'Frome Gateway' amended. Estimate of expected new homes now provided in explanatory text. Policy refers to development being in accordance with the Frome Gateway Spatial Regeneration Framework, which will shape development in the area. • Publication Version Policy DS5 'Frome Gateway' advocates a mix of uses. This is expected to lead to a wide variety of employment opportunities. • Publication Version Policy DS5 'Frome Gateway' makes reference to development enhancing the River Frome as a townscape feature, pedestrian route and green infrastructure corridor. The policy also requires development to accord with the Frome Gateway Spatial Regeneration Framework. This is currently being developed in consultation with the community and stakeholders and will further guide development proposals in the area taking into account important local issues. • Publication Version Policy DS5 'Frome Gateway' sets out approach to flood risk. Publication Version Policy FR1 'Flood risk' provides more detail. Frome Gateway Spatial Regeneration Framework will also address this issue.

East Bristol

Table 58 - main issues raised on East Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Greater recognition and reference needed to transport infrastructure improvements required to support new development. Examples included improvements to Stapleton Road and Lawrence Hill railway stations and reducing traffic on arterial routes such as Church, Fishponds and Stapleton Roads. 	<ul style="list-style-type: none"> • Local Plan Publication Version policies in this chapter provide appropriate reference to transport infrastructure improvements required from new development proposals. Other improvements will be delivered through separately delivered plans and programmes referred to in Publication Version Policy T2 'Transport infrastructure improvements'.

Draft Policy DS6: Lawrence Hill

Table 59 - main issues raised on Draft Policy DS6: Lawrence Hill and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Stronger commitment required on reconfiguration of Lawrence Hill roundabout. • Council-led masterplan needed. • Specific reference sought to delivery of social, council, affordable and family housing, with associated targets. 	<ul style="list-style-type: none"> • Appropriate reference is provided in draft policy and this is maintained in Local Plan Publication Version Policy DS6 'Lawrence Hill'. • Publication Version Policy DS6 'Lawrence Hill' provides appropriate basis for shaping development proposals in this location. This is supported with reference to development also being expected to accord with a regeneration framework which will coordinate the approach to development across the area. • This is considered to be addressed with reference to new development including a mix of types, sizes and tenures. This will be supported by Publication Version policies Policy AH1 'Affordable housing provision' and Policy H4 'Housing type and mix'.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Both support and objection to potential for tall buildings. Existing pressures on services and infrastructure raised, with need to secure adequate improvements alongside new development, such as active travel proposals. 	<ul style="list-style-type: none"> Draft policy made clear that tall buildings may be appropriate and this approach is maintained for the Publication Version. Both refer to supporting Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered. Text has been added to Publication Version Policy DS6 'Lawrence Hill'. This states that, as part of securing comprehensive change in this area, individual development sites will be expected to contribute appropriately to the delivery of supporting infrastructure, services and facilities.

Draft Policy DS7: Central Fishponds

Table 60 - main issues raised on Draft Policy DS7: Central Fishponds and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Council-led masterplan needed. Potential new housing capacity considered to be much higher. Concerns about increased pressure on local services as well as noise, traffic and congestion impacts, particularly at Station Road, Filwood Road bridge and Hockey's Lane. 	<ul style="list-style-type: none"> Local Plan Publication Version Policy DS7 'Central Fishponds' provides appropriate basis for shaping development proposals in this location. This is supported with reference to development being expected to accord with a regeneration framework which will coordinate the approach to development across the area. Publication Version Policy DS7 'Central Fishponds' maintains draft policy approach. This makes clear that higher levels of density may be appropriate subject to a co-ordinated approach to development which delivers quality urban design. Text has been added to Publication Version Policy DS7 'Central Fishponds'. This states that, as part of securing comprehensive change in this area, individual development sites will be expected to contribute appropriately to the delivery of supporting infrastructure, services and facilities.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Objection to potential of tall buildings due to concerns about higher density leading to negative traffic impacts. 	<ul style="list-style-type: none"> • Draft policy made clear that tall buildings may be appropriate and this approach is maintained for the Publication Version. Both refer to supporting Policy DC2 'Tall buildings'. This sets out criteria to ensure important planning considerations are appropriately considered.

South Bristol

Table 61 - main issues raised on South Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Insufficient employment land proposed in South Bristol to: <ul style="list-style-type: none"> ○ Provide for current and future employment and business creation needs. ○ Address north / south Bristol economic divide. 	<ul style="list-style-type: none"> • Supporting text to the Local Plan Publication Version chapter on South Bristol explains the approach to addressing this issue. Building on recent significant health, workspace, educational and transport infrastructure improvements and provision, it refers to the Local Plan approach of continuing to safeguard large areas of land for industry. New industry and distribution locations are also proposed, while new workspace will be created in growth and regeneration areas as well as part of mixed-use development allocations.

Draft Policy DS8: Central Bedminster

Table 62 - main issues raised on Draft Policy DS8: Central Bedminster and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Potential new housing capacity including student accommodation considered to be much higher. • Need for more specific wording to ensure housing mix matches likely occupiers, i.e. smaller units 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy DS8 'Central Bedminster' has been amended with a revised estimate of around 3,500 homes expected to be provided. • Considered to be addressed with reference to development contributing to an appropriate mix of housing type. Issue also addressed by Local Plan Publication Version

Main issues raised	How they were addressed
<p>for younger age groups and first-time buyers.</p> <ul style="list-style-type: none"> • Workspace: <ul style="list-style-type: none"> ○ Strengthen policy to ensure a range of workspaces are provided as part of the proposed mixed-use approach. ○ Clarify what workspace will be sought, e.g. refer to specific use classes. ○ Lack of evidence to suggest demand for new workspace. Therefore may not be necessary to provide new workspace on redeveloped employment sites. • Important to maintain uniqueness of Bedminster’s character, including mix of residential and previous industrial buildings. • Objection to tall buildings / high density approach due to negative impacts on character and views. 	<p>Policy H4 ‘Housing type and mix’.</p> <ul style="list-style-type: none"> • Workspace: <ul style="list-style-type: none"> ○ It is considered that the draft policy made adequate reference to this issue and this has been maintained in Publication Version Policy DS8 ‘Central Bedminster’. It will also be addressed by other Local Plan Publication Version policies including Policy E6A ‘New workspace within mixed use development’. • It is considered that the draft policy addressed issue of character with reference to development reinforcing the area as a mixed and inclusive community with a diversity of land uses. This approach has been maintained for Publication Version Policy DS8 ‘Central Bedminster’. This will be supported by other policies including Policy DPM1 ‘Delivering well-designed, inclusive places’ which emphasises the importance of proposals understanding and respecting an area’s unique built, natural and cultural characteristics and context. • Draft policy made clear that tall buildings may be appropriate and this approach is maintained for the Publication Version. Both refer to supporting Policy DC2 ‘Tall buildings’. This sets out criteria to ensure

Main issues raised	How they were addressed
	important planning considerations are appropriately considered.

Draft Policy DS9: Brislington

Table 63 - main issues raised on Draft Policy DS9: Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Boundary should include Wilverley Trading Estate on north side of Bath Road. • Unclear what would constitute ‘an appropriate form and amount of new workspace’ to be provided in mixed-use schemes. • Environment Agency advised development to be located outside the current and future floodplain of the Brislington Brook. It was noted that flood risk was not referred to, despite being an issue locally. 	<ul style="list-style-type: none"> • Boundary in draft policy considered appropriate and maintained in Publication Version Policy DS9 ‘Brislington’. • Further detail provided in Publication Version Policy E6A ‘New workspace within mixed use development’. • It is considered that this issue will be addressed by Local Plan Publication Version Policy FR1 ‘Flood risk and water management’.

Hengrove and Knowle West

Table 64 - main issues raised on Hengrove and Knowle West and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern about lack of new local plan policy relating to Knowle West, Hartcliffe, Withywood, Hengrove, Whitchurch Park and Bishopsworth and how sustainable mixed communities can be created. A South Bristol Regeneration Framework was requested. 	<ul style="list-style-type: none"> • It is considered that appropriate development plan policy coverage will be provided by new policies and proposals in the Local Plan Publication Version as well as the Hengrove and Whitchurch Park Neighbourhood Plan, which came into force in 2019.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Allocate more employment land in Filwood and Knowle West. • Hengrove Park: <ul style="list-style-type: none"> ○ Query why proposal for second town centre at Hengrove Park has been dropped. ○ Concern at lack of sizeable employment land allocation at Hengrove Park, given local workspace demand. • Knowle West: <ul style="list-style-type: none"> ○ Reference to Knowle West Regeneration Framework should be expanded to update on most its recent guidance and agreed objectives. Developers should be expected to show how their schemes have responded to the Framework. 	<ul style="list-style-type: none"> • Supporting text to Local Plan Publication Version chapter on South Bristol refers to the Local Plan approach of continuing to safeguard large areas of land for industry. New industry and distribution locations are also proposed, while new workspace will be created in growth and regeneration areas as well as part of mixed-use development allocations. More detail is provided in the Local Plan Publication Version’s ‘Economy and inclusive growth’ chapter, including policies E2 ‘Economic development land strategy’ and E5 ‘Industry and Distribution Areas’. • Hengrove Park: <ul style="list-style-type: none"> ○ Hengrove and Whitchurch Park Neighbourhood Plan will steer the approach to development in Hengrove Park. The Local Plan Publication Version also explains that planning permission has been granted for the major residential-led mixed-use redevelopment of Hengrove Park. • Knowle West: <ul style="list-style-type: none"> ○ It is considered that appropriate reference to the Regeneration Framework was made in the 2019 consultation and this has been maintained for the Local Plan Publication Version.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Concern there is no clear mechanism for increasing the number of services and facilities within the area, e.g. supermarket on Filwood Broadway, or improvement of local centres. ○ Consider updating existing Filwood Broadway Local Plan Site Allocations (BSA1120 and BSA1122) to increase level of retail floorspace sought. ○ Existing Novers Hill Local Plan Site Allocation BSA1108 considered suitable for community-led housing development. 	<ul style="list-style-type: none"> ○ Local Plan Publication Version Policy IDC1 'Development contributions and CIL' will be used to ensure new development is supported by the provision of infrastructure, services and facilities. ○ Amount of proposed retail floorspace in existing allocations considered appropriate and maintained for the Local Plan Publication Version. ○ The existing boundary for Site Allocation BSA1108 is no longer considered appropriate for housing. A revised boundary has been drawn for the Local Plan Publication Version which covers only the previously developed part of BSA1108. This is now referenced as BSA1108A and is proposed for a housing allocation. Proposals for community-led housing are encouraged by Publication Version Policy H5 'Self-build and community-led housing'.

Draft Policy DS10: Changes to the Green Belt in South Bristol

Table 65 - main issues raised on Draft Policy DS10: Changes to the Green Belt in South Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Lack of justification that exceptional circumstances created by South Bristol Link Road. 	<p>The draft proposals in 2018 and 2019 have been amended for the Local Plan Publication Version following consultation in 2022. Land at Yew Tree Farm is no longer proposed as a development allocation. The approach to remove from the</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Land performing Green Belt functions. • Preference for brownfield development focus over greenfield / Green Belt. • Concern about piecemeal approach with potential for Green Belt release in adjoining land in Bath and North East Somerset. • Contrary to sustainable development and tackling climate change objectives. • Need for housing questioned. • Green Belt land important for food production. • Potential for development land created by South Bristol Link Road to provide additional employment land should be assessed. • Bath and North East Somerset Council suggest BCC should consider any spatial implications arising from the identification in the Joint Spatial Plan of a strategic development location at Whitchurch. The allocation of this land will be delivered through the Bath and North East Somerset Local Plan and will require significant new transport infrastructure. • Environment Agency object to development allocation adjacent to Long Ashton Park and Ride due to concern at lack of evidence 	<p>Green Belt land at Ashton Vale and adjacent to Elsbert Drive and identify them as development allocations has been maintained; Local Plan Publication Version policies DS10 ‘The Green Belt’ and DS11 ‘Development allocations – southwest Bristol’ refer.</p> <p>The approach is considered appropriate to ensure a sufficient number and range of development sites is available to meet housing need.</p> <p>Policy DS11 explains that land at Ashton Vale has now received planning permission (ref. 21/03166/P) for around 500 homes. It also states that development on land adjacent to Elsbert Drive should be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community.</p> <p>Publication Version Policy H5 ‘Self-build and community-led housing’ requires 5% of homes in the allocation at land adjacent to Elsbert Drive to be in the form of self-build/custom-build housing and/or community-led housing.</p>

Main issues raised	How they were addressed
<p>that site is not at flood risk. Issue relates to flood storage area as mitigation for the MetroBus scheme and failure to update Flood Map with latest flood modelling information. Need to ensure proposed allocation is not adversely impacted by nearby flood storage area.</p>	

Draft Policy DS11: Development allocations – southwest Bristol

Table 66 - main issues raised on Draft Policy DS11: Development allocations – southwest Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of justification that exceptional circumstances have been created by South Bristol Link Road construction. • Land currently performs Green Belt functions. • Preference for brownfield development focus over Green Belt. • Contrary to sustainable development and tackling climate change objectives. • Need for housing questioned. • Land important for food production and biodiversity / nature recovery. • Concern at potential negative impacts on health and wellbeing due to loss of recreation land. 	<p>The draft proposals in 2018 and 2019 have been amended for the Local Plan Publication Version following consultation in 2022. Land at Yew Tree Farm is no longer proposed as a development allocation. The approach to remove from the Green Belt land at Ashton Vale and adjacent to Elsbert Drive and identify them as development allocations has been maintained; Local Plan Publication Version policies DS10 ‘The Green Belt’ and DS11 ‘Development allocations – southwest Bristol’ refer.</p> <p>The approach is considered appropriate to ensure a sufficient number and range of development sites is available to meet housing need.</p> <p>Policy DS11 explains that land at Ashton Vale has now received planning permission (ref. 21/03166/P) for around 500 homes. It also states that development on land adjacent to Elsbert Drive should be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community.</p> <p>Publication Version Policy H5 ‘Self-build and community-led housing’ requires 5% of homes in</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Exacerbation of existing issues around traffic, congestion, air quality and transport infrastructure plus access to community facilities such as GPs and schools. • Clarifications sought on: <ul style="list-style-type: none"> ○ affordable housing delivery for the sites. ○ how development proposals in adjoining North Somerset Council's area will coincide with Policy DC11. ○ transport infrastructure plans including Park and Ride for the A38. • Allocations should be for mixed uses rather than only homes. • Land at Ashton Gate: <ul style="list-style-type: none"> ○ Should be re-named 'Land North of Metrobus at Ashton Vale'. ○ Policy should be flexibly worded to allow for more than 500 homes to be provided. ○ Acknowledgement needed in policy to co-operate with North Somerset Council as access to 	<p>the allocation at land adjacent to Elsbert Drive to be in the form of self-build/custom-build housing and/or community-led housing.</p>

Main issues raised	How they were addressed
<p>site required within NSC's area.</p> <ul style="list-style-type: none"> • Land at Yew Tree Farm: <ul style="list-style-type: none"> ○ Objection to loss of Green Belt land and last working farm in city's boundaries. ○ Concern at potential negative impacts on environment, traffic, congestion, air quality and infrastructure. ○ Will make insignificant contribution to housing delivery, with any benefits outweighed by environmental costs. • Land adjacent to Elsbert Drive: <ul style="list-style-type: none"> ○ Capacity considered to be 120 homes. Policy should state minimum of 100 homes and up to 150. ○ Objection to loss of Green Belt land. ○ Preference for brownfield development focus over Green Belt. ○ Concern at potential negative impacts on health and wellbeing, amenity, environment, traffic, congestion, 	

Main issues raised	How they were addressed
<p>road safety, air quality, biodiversity, semi-rural character and infrastructure.</p> <ul style="list-style-type: none"> ○ 150 homes considered to be overdevelopment. ● Affordable housing: <ul style="list-style-type: none"> ○ Lack of justification for 40% requirement. ○ Flexibility needed as some sites may need significant remediation and have higher development costs. ● Community led / self-build (5% requirement): <ul style="list-style-type: none"> ○ Query why requirement not applied to other proposed allocations across Bristol. ○ Lack of justification as could affect viability / delivery of rest of allocation sites. ○ Remove requirement as not possible to create separate community led / self-build area given small size of allocation sites. ● North Somerset Council wished to work with BCC to ensure alignment of 	

Main issues raised	How they were addressed
<p>diverted Ashton Vale Road is shown in Local Plan. To address issue of avoiding merger with Long Ashton, they also thought policy criteria should reference Area of Separation designated in Long Ashton Neighbourhood Plan at land north of Ashton Vale Town Green.</p>	

Draft Policy DS12: New neighbourhood – Bath Road, Brislington

Table 67 - main issues raised on Draft Policy DS12: New neighbourhood – Bath Road, Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Should also include land north of A4 Bath Road, including Brislington Cricket Club. • Objection to loss of Green Belt land and open space and lack of accompanying evidence. • Concern about biodiversity impacts, such as loss of potential nature recovery sites and mature trees. • Concern about potential for worsened air quality and traffic congestion. • Policy should require developers to bring forward a co-ordinated masterplan. • Site has potential to deliver significant amount of employment land for South 	<ul style="list-style-type: none"> • Boundary considered appropriate and maintained for Local Plan Publication Version Policy DS12 ‘New neighbourhood – Bath Road, Brislington’. • Rationale explained in draft policy, which is maintained for Publication Version Policy DS12. • Publication Version Policy DS12 refers to new development addressing retention of important trees, hedgerows and other green infrastructure as well as biodiversity gain. • Addressed by reference in Publication Version Policy DS12 to new development being supported by appropriate local and strategic transport infrastructure. • Publication Version Policy DS12 requires development to be in accordance with a detailed development framework or master plan prepared in consultation with the local community. • Approach of Publication Version Policy DS12 for residential-led mixed use development considered appropriate. Local Plan

Main issues raised	How they were addressed
<p>East Bristol.</p> <ul style="list-style-type: none"> • Affordable housing: <ul style="list-style-type: none"> ○ Lack of justification for 40% requirement. • Community led / self-build (5% requirement): <ul style="list-style-type: none"> ○ Should be 10%. ○ Lack of justification as could affect viability / delivery of main part of housing allocation. • Bath and North East Somerset suggested joint work with BCC to: <ul style="list-style-type: none"> ○ revised Green Belt boundary to be identified in both councils Local Plans. ○ agree site of re-located Brislington Park and Ride. ○ identify infrastructure requirements such as health and education facilities. • Environment Agency identified that part of proposed area falls within 	<p>Publication Version Policy E2 'Economic development land strategy' provides the strategic policy approach to the scale and location of new workspace to be provided over the plan period.</p> <ul style="list-style-type: none"> • Affordable housing: <ul style="list-style-type: none"> ○ Policy DS12 expects development to provide an appropriate level of affordable housing with a 35% requirement referred to. This is considered to be a suitable amount, with more detail provided in Publication Version Policy AH1 'Affordable housing provision'. • Community led / self-build (5% requirement): <ul style="list-style-type: none"> ○ This has been maintained for Publication Version Policy DS12 and is considered appropriate. More detail provided in Publication Version Policy H5 'Self-build and community-led housing'. • On-going joint work has been progressed. • It is considered that this issue will be addressed as part of the preparation of a detailed development framework or master

Main issues raised	How they were addressed
<p>Flood Zone 3. Development should be located within Flood Zone 1 following sequential principles if possible.</p>	<p>plan carried out in consultation with the local community and stakeholders referred to in Publication Version Policy DS12. It will also be covered by Publication Version Policy FR1 'Flood risk and water management'.</p>

North Bristol

Table 68 - main issues raised on North Bristol and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Reference sought to public transport routes and improvements which will support housing growth, such as Henbury Line. • Refer to Brabazon Hangar and its mixed-use redevelopment potential. • Policy approach should promote 'suburban living' as well as urban living to reflect those parts of North Bristol with a suburban character. Areas such as Westbury Park, Henleaze, Westbury on Trym, Sneyd Park, Stoke Bishop and Henbury should remain leafy suburbs. • Concern at potential negative impacts on on-street parking issues, as well as whether existing community facilities and supporting infrastructure 	<ul style="list-style-type: none"> • Local Plan Publication Version policies in this chapter provides appropriate reference to transport infrastructure improvements required from new development proposals. Other improvements will be delivered through separately delivered plans and programmes referred to in Publication Version Policy T2 'Transport infrastructure improvements'. • Planning permission for the conversion of the Brabazon Hangars into an events arena granted in 2020. Not considered necessary to refer to this in Local Plan Publication Version. • Ensuring new development addresses important local character and distinctiveness will be covered by a number of Local Plan Publication Version policies in the 'Design and conservation' chapter. • Addressed in various Local Plan Publication Version policies including T2 'Transport infrastructure improvements'; T3A 'Transport development management'; IDC1 'Development contributions and CIL'; and Policy CF1 'Provision of community facilities'.

Main issues raised	How they were addressed
<p>could cope with proposed housing growth.</p> <ul style="list-style-type: none"> Greater clarity sought on future role of Eastgate Retail Park with policy flexibility needed to allow it to develop and upgrade. 	<ul style="list-style-type: none"> The Local Plan approach to out of centre retail parks accords with national planning policy.

Draft Policy DS13: Lockleaze

Table 69 - main issues raised on Draft Policy DS13: Lockleaze and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Policy should promote green infrastructure, urban food growing and public realm enhancements. Require 40% affordable housing provision. Greater ambition needed on requirements for new housing to be self/custom-built and community-led to reflect local high demand. Consider at least 20% of new houses could be delivered in this way. Site allocations should be amended accordingly. Refer to Lockleaze Community Plan (2019 - 2024). 	<ul style="list-style-type: none"> Draft policy made reference to development including green infrastructure and public realm enhancements and this is maintained in Local Plan Publication Version Policy DS13 'Lockleaze'. Food growing opportunities addressed by Publication Version Policy FS2 'Provision of food growing space in new developments', amongst others. An appropriate level of affordable housing will be secured through the application of Publication Version Policy AH1 'Affordable housing provision'. The approach to this issue is covered by Publication Version Policy H5 'Self-build and community-led housing'. Draft policy makes reference to work by the local community identifying a number of development opportunities alongside those already allocated in the local plan. This approach has been maintained for Local Plan Publication Version Policy DS13 'Lockleaze' and is considered to provide an appropriate

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • 100 dwelling per hectare considered inappropriate. Vistas across Lockleaze, especially from Stoke Park, should not be obscured. • Concern that provision of workspace requirement may affect viability of site development. • Specific transport improvements sought such as new railway station for Lockleaze. • Enhanced amenities needed to support housing growth such as new shops, cafes, restaurants, libraries, health and education facilities. • Policy should cover: <ul style="list-style-type: none"> ○ retail provision. ○ need to work with South Gloucestershire Council on cross-boundary issues. 	<p>basis for guiding development proposals in the area alongside other Local Plan policies.</p> <ul style="list-style-type: none"> • Publication Version Policy DS13 'Lockleaze' maintains draft policy approach in providing information on potential indicative housing density. This will be supported by Publication Version policies UL1 'Effective and efficient use of land', UL2 'Residential densities' and other relevant policies. • Draft policy considered to be an appropriate approach and maintained in Publication Version Policy DS13 'Lockleaze'. This will be supported by Publication Version Policy E6A 'New workspace within mixed use development'. • Draft policy makes reference to development being supported by transport improvements including public transport enhancements, cycle provision and pedestrian route improvements and this is maintained in Publication Version Policy DS13 'Lockleaze'. Issue also addressed by Publication Version Policy T2 'Transport infrastructure improvements'. • Introductory text to draft policy explained that, as existing housing density in Lockleaze is low, infill development at higher densities can help to support and encourage investment in existing and new supporting facilities. This is maintained in Publication Version Policy DS13 'Lockleaze'. • Policy coverage requests: <ul style="list-style-type: none"> ○ This issue will be addressed through application of Local Plan Publication Policy SSE1 'Supporting Bristol's Centres - network and hierarchy' and other policies in the 'Centres, shopping, and the evening economy' chapter.

Main issues raised	How they were addressed
	<ul style="list-style-type: none"> ○ Not considered necessary to make specific reference to this within the policy.

Draft Policy DS14: Central Southmead

Table 70 - main issues raised on Draft Policy DS14: Central Southmead and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Provision of community facilities should specifically reference a youth support focus. ● Reference to Glencoyne Square providing housing and open space should also refer to provision of community amenities / facilities. ● Policy should seek provision of improvements to Doncaster Road Park. ● Reference should be made in policy to urban food growing. 	<ul style="list-style-type: none"> ● Not considered necessary to make this specific reference. A more flexible approach is preferred to allow for the type of any community facilities provision to be shaped by local needs at the time proposals are made over the course of the plan period. ● Text has been added to Local Plan Publication Version Policy DS14 'Central Southmead' to refer to the planning permission granted for a mixed-use development at Glencoyne Square in 2021. ● Doncaster Road Park is outside the DS14 'Central Southmead' policy area. Issue of open space provision is addressed by a number of Local Plan Publication Version policies, including Policy GI A 'Open Space for Recreation'. ● Food growing opportunities addressed by Publication Version Policy FS2 'Provision of food growing space in new developments', amongst others.

Infrastructure and Developer Contributions

Draft Policy IDC1: Development contributions and CIL

Table 71 - main issues raised on Draft Policy IDC1: Development contributions and CIL and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Reference should be made to development viability 	<ul style="list-style-type: none"> ● Not considered necessary as supporting text to policy signposts to Planning Obligations

Main issues raised	How they were addressed
<p>and how that affects whether planning obligations can be provided.</p> <ul style="list-style-type: none"> • Reference to securing mitigation through planning obligations not in accordance with NPPF. Obligations only to be used where planning conditions cannot address unacceptable impacts. • Objection to obligations being sought from ‘any’ development. Not compliant with NPPF for affordable housing obligations where a threshold of development size is set. • Request for policy to reference Community Asset Transfers and how consultation on these should take place. • Specific references sought to: <ul style="list-style-type: none"> ○ replacement of trees through section 106 agreements; ○ Community facilities and uses should be specifically mentioned in the policy, with reference to the council’s Social Value Policy. ○ community infrastructure levy containing a 	<p>supplementary planning document. This details approach taken to secure contributions where appropriate.</p> <ul style="list-style-type: none"> • Draft policy considered to accord with national planning policy and guidance. • Draft policy considered to accord with national planning policy and guidance. • Not considered appropriate for this to be incorporated as relates to matters beyond the determination of planning applications. Information on Community Asset Transfers provided on BCC website. • Specific references sought: <ul style="list-style-type: none"> ○ Addressed in Local Plan Publication Version Policy BG4 ‘Trees’. ○ Not considered necessary to include a specific mention to community facilities and uses in this strategic policy. Re. social value, Local Plan Publication Version contains Policy SV1 ‘Social value and inclusion’. This expects all major developments proposals to be accompanied by a social value strategy. ○ This would be considered as part of any review of the Community Infrastructure Levy.

Main issues raised	How they were addressed
<p style="text-align: center;">biodiversity or nature recovery strand.</p> <ul style="list-style-type: none"> • Sport England felt all new dwellings should provide new or enhanced sport and recreation facilities. • Natural England sought reference to green infrastructure, particularly the strategic approach to mitigating effects on sites of European importance for nature conservation. • Environment Agency considered provision of flood risk management infrastructure should be referenced. 	<ul style="list-style-type: none"> • The provision of new or enhanced sport and recreation facilities will be secured where appropriate using Local Plan Publication Version policies IDC1 ‘Development contributions and CIL’, CF1 ‘Provision of community facilities’ and CF2 ‘Retention of community facilities’. • Not considered necessary to specifically reference green infrastructure within this strategic policy. Local Plan Publication Version Policy BG1 ‘Green Infrastructure and biodiversity in new development’ sets out the council’s expectations for the provision of green infrastructure in new development. • Not considered necessary to specifically reference flood risk management infrastructure within this strategic policy. Local Plan Publication Version Policy FR1 ‘Flood risk and water management’ sets out the council’s approach to the provision of on- and off-site flood risk mitigation measures where appropriate. Policy FR2 ‘Bristol Avon Flood Strategy’ seeks to ensure relevant development proposals contribute to the implementation of that strategy through their design or financial contributions.

Urban Living: Making the best use of the city’s land

Table 72 - main issues raised on Urban Living: Making the best use of the city’s land and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Highways England sought specific policy on provision of parking and approach to on-street parking in vicinity of ‘Urban Living’ allocations. They also 	<ul style="list-style-type: none"> • Addressed by policies in Transport chapter of Local Plan Publication Version. Parking issues covered in Policy T4A ‘Parking, servicing and the provision of infrastructure for electric vehicles’. Policy T3A ‘Transport development management’ requires a Transport

requested an assessment to predict impact of this approach on local and strategic highway network.	Assessment / Statement to be submitted alongside a planning application where development is likely to have a significant traffic impact.
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Draft Policy UL1: Effective and efficient use of land

Table 73 - main issues raised on Draft Policy UL1: Effective and efficient use of land and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Important that housing capacity of urban living sites is realistically assessed to ensure no detrimental impact on residential amenity or character and historic fabric of city. • Policy should recognise mixed use not always appropriate within single buildings. • Policy should include proviso that, when assessing 'optimum density', weight will be given to impacts of proposal on existing population, such as parking issues, access to public and active transport, air quality and open space. • Specific references sought for inclusion in policy wording: <ul style="list-style-type: none"> ○ that previously developed land is a 	<ul style="list-style-type: none"> • Approach informed by published Urban Potential Assessment. • Flexibility is provided in Local Plan Publication Version Policy UL1 'Effective and efficient use of land'. In relation to achieving optimum density, the policy makes clear that this may include development of mixed uses within buildings. • Issues addressed in other Local Plan Publication Version policies including: Policy DPM1 'Delivering well-designed, inclusive places'; Policy DC1 'Liveability in residential development including space standards and private outdoor space'; Policy T1 'Development and transport policies'; Policy T3A 'Transport development management'; Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles'; Policy HW2 'Air quality'; Policy BG1 'Green Infrastructure and biodiversity in new development'; and Policy GI A 'Open Space for Recreation'. • Specific references sought: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy UL1 'Effective and efficient use of land' provides sufficient clarity on the priority being given to development on previously developed land.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ priority for development; ○ climate change mitigation in development; ○ higher minimum density for development over 20 units; ○ employment and retail uses. ● Policy should consider benefits of integrating ecological functionality and services into new developments so that they provide food production, ecological connectivity, water conservation and related quality of life improvements. ● Concern that Diagram 6.1 lacks clarity for defining different density level boundaries. ● 400m walking distance parameter too restrictive; 800m a suggested alternative as per Manual for Streets. 	<ul style="list-style-type: none"> ○ Addressed in policies in the Local Plan Publication Version’s ‘Net Zero and Climate’ chapter. ○ Addressed in Local Plan Publication Version Policy UL2 ‘Residential densities’. ○ Approach applies to all uses. ● Addressed in other Local Plan Publication Version policies including policies FS2 ‘Provision of food growing space in new developments’; BG1 ‘Green Infrastructure and biodiversity in new development’; and NZC1 ‘Climate change, sustainable design and construction’. ● Diagram 6.1 shows indicative locations where more intensive forms of development will be expected on suitable sites. In conjunction with the policy wording and supporting text, it is considered that the diagram provides sufficient clarity for informing development proposals. ● 400m considered to be an appropriate distance for the purposes of this policy.

Draft Policy UL2: Residential densities

Table 74 - main issues raised on Draft Policy UL2: Residential densities and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Policy should include reference to ‘liveability’ to 	<ul style="list-style-type: none"> ● Addressed in introductory text to policy which signposts to other supporting policies

Main issues raised	How they were addressed
<p>make clear optimisation is balance between liveability and density.</p> <ul style="list-style-type: none"> • More flexibility needed in policy to ensure all schemes will be considered on a case-by-case basis. • Policy should include proviso that, when assessing 'optimum density', weight will be given to impacts of proposal on existing population, such as parking issues, access to public and active transport, air quality and open space. • Clarity sought on reference to 'safeguarding the special interest and character of the area.' Does this mean Conservation Areas? Concern that policy should not attempt to provide statutory protection to areas not designated as heritage assets. • Concern that minimum net density of 50 dwellings per hectare too low to meet housing need. • Density higher than 200 dph for city centre suggested, e.g. 300 or a 	<p>in the Local Plan relating to liveability and design.</p> <ul style="list-style-type: none"> • Supporting text to the policy makes clear that not all sites will be suitable for higher density forms of development. All relevant Local Plan policies and guidance will be used to determine the appropriateness of individual proposals. • Issues addressed in other Local Plan Publication Version policies including: Policy DPM1 'Delivering well-designed, inclusive places'; Policy DC1 'Liveability in residential development including space standards and private outdoor space'; Policy T1 'Development and transport policies'; Policy T3A 'Transport development management'; Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles'; Policy HW2 'Air quality'; Policy BG1 'Green Infrastructure and biodiversity in new development'; and Policy GI A 'Open Space for Recreation'. • Aim of policy is ensure development proposals optimise the efficient use of land through encouraging higher density residential development in appropriate locations. Reference to 'safeguarding the special interest and character of the area' seeks to ensure that an appropriate density is achieved having regard to the context of the application site and would include Conservation Areas. • 50 dwellings per hectare considered to be an appropriate minimum. Supporting text to the policy makes clear that higher densities will be sought where this would be consistent with site considerations and other Local Plan policies. • 200 dwellings per hectare for city centre proposals considered to be an appropriate minimum.

Main issues raised	How they were addressed
<p>statement included of an expectation that minimum threshold will be exceeded.</p> <ul style="list-style-type: none"> • Three policy areas identified considered too broad. • Setting of minimum densities contrary to concept of optimising density, which should be based on site specific issues and good design. 	<ul style="list-style-type: none"> • The three areas are considered appropriate in seeking to secure higher density residential development in locations most suitable to accommodate it. This is due to their relatively good accessibility by sustainable transport modes to employment opportunities, services and other facilities. • Supporting text to the policy makes clear that higher densities will be sought where this would be consistent with site considerations and other Local Plan policies. This would include the suite of design policies set out in the Local Plan Publication Version.

Housing

Draft Policy H1: Delivery of new homes

Table 75 - main issues raised on Draft Policy H1: Delivery of new homes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Housing target too low. Does not reflect assessed need. • Allocate additional residential development sites to ensure a 5-year housing land supply. • Include reference to a policy review period. • Concerns about infrastructure and environment impacts 	<ul style="list-style-type: none"> • Appropriate target set out in Local Plan Publication Version Policy H1 'Delivery of new homes – Bristol's housing requirement' based on appropriate assessment of need and capacity. • Local Plan Publication Version contains a range of policy approaches to ensure identified housing need is delivered and exceeded. • Local Plan Publication Version includes commitment to review the plan within 5 years of adoption with a particular focus on housing needs and delivery. • Adequate infrastructure to support new development addressed by Local Plan Publication Version Policy IDC1

Main issues raised	How they were addressed
<p>resulting from housing requirement and ambition to exceed it.</p> <ul style="list-style-type: none"> • Include flexibility to reflect Joint Spatial Plan examination outcome. • Insufficient reference to specific housing types. 	<p>‘Development contributions and CIL’. Environmental impacts covered by various policies in the Publication Version’s Green Infrastructure and Biodiversity, Net Zero and Carbon Health chapters, amongst others.</p> <ul style="list-style-type: none"> • Joint Spatial Plan withdrawn in 2020. • Addressed in Local Plan Publication Version Policy H4 ‘Housing type and mix’.

Providing affordable homes

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Objection to lack of specific policy as creates uncertainty. • Lack of viability testing of Joint Spatial Plan policy. • Amend definition of affordable housing to reflect revised NPPF. 	<ul style="list-style-type: none"> • Policy introduced for 2022 consultation and Publication Version following 2020 withdrawal of Joint Spatial Plan. • Joint Spatial Plan withdrawn in 2020. • Definition provided in Local Plan Publication Version Policy AH1 ‘Affordable housing provision’ which reflects the NPPF.

Draft Policy H2: Preventing the loss of residential accommodation

Table 76 - main issues raised on Draft Policy H2: Preventing the loss of residential accommodation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Strengthen approach to prevent loss of family and key worker housing to: <ul style="list-style-type: none"> ○ Short-term lets (such as Airbnbs); ○ Student accommodation. 	<p>Draft policy considered appropriate and maintained for Local Plan Publication Version.</p>

Draft Policy H3: Making the best use of site allocations

Table 77 - main issues raised on Draft Policy H3: Making the best use of site allocations and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern that aim to ‘exceed’ or ‘be consistent with minimum density’ should not override considerations of whether schemes will create sustainable, well-balanced and supportive communities. • Clarification sought on: <ul style="list-style-type: none"> ○ Whether Growth and Regeneration Areas can be considered as allocations; ○ Definition of ‘overriding need’ and ‘essential community facilities’. 	<p>Draft policy not taken forward to 2022 consultation document or Local Plan Publication Version.</p>

Draft Policy H4: Housing type and mix

Table 78 - main issues raised on Draft Policy H4: Housing type and mix and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy should strengthen its focus on restoring balanced, mixed communities by addressing areas with existing excess concentrations of one dwelling type (e.g. student accommodation). • Implementation of policy: <ul style="list-style-type: none"> ○ Consider using a ‘housing types target’ of what constitutes a 	<ul style="list-style-type: none"> • Draft policy adequately addressed this by its requirement that development should have regard to the need to redress any harmful housing imbalance that exists in an area. This approach maintained for Local Plan Publication Version Policy H4 ‘Housing type and mix’. • Implementation of policy: <ul style="list-style-type: none"> ○ Draft policy provided appropriate, proportionate and sufficiently flexible approach which reflected national planning policy and evidence of local need. Approach maintained for Local Plan Publication Version Policy H4.

Main issues raised	How they were addressed
<p>balanced community;</p> <ul style="list-style-type: none"> ○ Flexible approach without specific targets is needed to reflect individual site circumstances. ○ Appropriate mix should be based on response to market signals within area; ○ Securing appropriate mix needs underpinning by empirical evidence of need and type in different parts of city; ○ Clarify definition of ‘balanced community’. <ul style="list-style-type: none"> ● Re. references to having regard to ‘existing housing profile’ and redressing ‘harmful housing imbalance that exists’ in the area, unclear whether policy is expecting development to conform to existing profile of area or vary it. ● Query as to how appropriate mix will be determined in growth and regeneration areas with little existing residential development (e.g. St Philip’s Marsh). 	<ul style="list-style-type: none"> ● It is considered that the references can be readily understood and allow for an appropriate assessment to be made of a proposal’s suitability. ● Through supporting documentation planning applicants can explain how their proposal reflects the policy’s requirements. This will then be assessed by the decision maker.

Draft Policy H5: Self-build and community-led housing

Table 79 - main issues raised on Draft Policy H5: Self-build and community-led housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More allocations requested. • 5% target for Green Belt allocation sites should be increased. • Lack of evidence of demand, need or viability to justify policy. • Growth and regeneration areas: <ul style="list-style-type: none"> ○ Clarification needed on proportions required and justification; ○ Requirement for self-build only where viable and deliverable. • Affordable housing: <ul style="list-style-type: none"> ○ Objection to proposed approach as would mean community-led housing will not be sufficiently affordable for all members of the community; ○ South Gloucestershire Council considered affordable housing should be 	<ul style="list-style-type: none"> • Three sites are allocated for self-build, custom housebuilding and community-led housing in Local Plan Publication Version Policy H5 'Self-build and community-led housing'. In addition, supporting text explains that the council is working with community organisations to deliver community-led housing on seven other sites. • Draft policy percentage considered appropriate and maintained in Publication Version Policy H5. • Rationale for policy explained in introductory text. Local Plan Publication Version supported by viability assessment. • Growth and regeneration areas: <ul style="list-style-type: none"> ○ Clarification provided in supporting text to Publication Version Policy H5. ○ Approach set out in draft policy considered reasonable as reflects identified demand and likely potential of proposals in growth and regeneration areas to accommodate this form of housing. Policy approach maintained for Publication Version Policy H5. • Affordable housing: <ul style="list-style-type: none"> ○ Draft policy has been amended for Publication Version Policy H5 to explain the circumstances where affordable housing will be sought for community-led, self-build and / or custom housebuilding proposals.

Main issues raised	How they were addressed
<p>encouraged.</p> <ul style="list-style-type: none"> • Exception sites: <ul style="list-style-type: none"> ○ Concern at how ‘demonstrable support by local community’ would be evidenced and what the threshold will be for ‘deficiency of open space’. ○ Policy should go further with exception approach applied to any site. 	<ul style="list-style-type: none"> • Exception sites: <ul style="list-style-type: none"> ○ It is considered that the term ‘demonstrable support by local community’ provides useful flexibility to enable the decision maker to make an appropriate assessment of a proposal’s suitability. Deficiencies of open space will be assessed with reference to Local Plan Publication Version Policy GI A ‘Open Space for Recreation’. ○ Draft policy approach considered proportionate and reasonable, reflecting identified demand for community-led housing. It has been maintained for Publication Version Policy H5.

Draft Policy H6: Homes in multiple occupation and other shared housing

Table 80 - main issues raised on Draft Policy H6: Homes in multiple occupation and other shared housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More restrictive approach needed as well as more focus on addressing existing HMO concentrations. • Approach undervalues HMOs importance, particularly in providing affordable accommodation. • Policy should avoid negative framing of all HMO development and instead use positively 	<ul style="list-style-type: none"> • Draft policy sought to ensure appropriate balance between provision of HMOs and avoiding a local imbalance of such uses. This is considered reasonable and proportionate. Approach maintained for Local Plan Publication Version Policy H6 ‘Houses in multiple occupation and other shared housing’. • Positive contribution that HMOs can make to choice and affordability of housing is reflected in introductory text to Publication Version Policy H6. • It is considered that the draft policy achieved the aim of supporting proposals for HMOs provided a local imbalance of such uses are avoided. Approach maintained in Publication

Main issues raised	How they were addressed
<p>worded criteria to assess proposals including attainable rents, well-managed by a Registered Provider, approx. 5 bedrooms, and new builds that achieve high design standards.</p> <ul style="list-style-type: none"> • More clarity sought on meaning of ‘harm to amenity and character’ and ‘exacerbation of harmful conditions’. • Avoiding harmful concentrations: <ul style="list-style-type: none"> ○ Lack of evidence and viability-testing: of the 10% and 100m threshold. 	<p>Version Policy H6.</p> <ul style="list-style-type: none"> • It is considered that the draft policy provided sufficient clarity on these terms both in the policy wording and supporting text. This has been maintained in Publication Version Policy H6. • Avoiding harmful concentrations: <ul style="list-style-type: none"> ○ The draft policy was considered reasonable and justified in its introductory text and is supported by the ‘Managing the development of houses in multiple occupation’ Supplementary Planning Document. This approach has been maintained in Publication Version Policy H6. Local Plan Publication Version supported by viability assessment.

Draft Policy H7: Managing the development of purpose-built student accommodation

Table 81 - main issues raised on Draft Policy H7: Managing the development of purpose-built student accommodation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • University of Bristol sought removal of reference to indicative bedspace capacities. Policy text should instead confirm that purpose-built student accommodation proposals which individually or cumulatively exceed thresholds will be 	<ul style="list-style-type: none"> • Draft policy approach to bed space limits considered appropriate and maintained in Local Plan Publication Version Policy H7 ‘Managing the development of purpose-built student accommodation’ subject to an amendment allowing bed space limits to be exceeded in specified circumstances.

Main issues raised	How they were addressed
<p>acceptable if they comply with general requirements set out in the policy.</p> <ul style="list-style-type: none"> • Flexibility needed to ensure policy can adapt to any policy or strategy changes affecting growth in student numbers. • Potential inconsistency between number of bed spaces in policy (7,500) exceeding the 6,400 stated additional bedspaces required by University of Bristol. • Policy should reference current shortfall in high quality purpose-built student accommodation in Bristol. • Evidence base for capped figures in defined locations should be published and referenced within policy or supporting text. • Additional reference sought to management of purpose-built student accommodation. • Reference to proposals requiring support of University of Bristol: <ul style="list-style-type: none"> ○ considered onerous and unfair; 	<ul style="list-style-type: none"> • Local Plan will be reviewed within five years of its adoption. This review will be informed by results of the on-going monitoring of the supply of bed spaces against projected student accommodation needs within Bristol, as explained in supporting text added to Publication Version Policy H7. • Bedspace numbers have been updated for Publication Version Policy H7 to reflect the latest student growth projections for the revised 2025-2040 plan period of the Local Plan. • Draft policy provided a positive approach to addressing the accommodation needs of the city’s growing student population in a sustainable manner. This approach has been maintained for Publication Version Policy H7. • Bedspace numbers have been updated for Publication Version Policy H7 to reflect the latest student growth projections for the revised 2025-2040 plan period of the Local Plan. Figures provided for specified locations based on assessment of appropriate capacities. • Additional text added to Publication Version Policy H7 to make clear that all purpose-built student accommodation proposals will be expected to be subject to an appropriate management regime set out in an approved management plan. • Publication Version Policy H7 amended to require purpose-built student accommodation proposals to have support of relevant higher education provider when larger scale development is proposed.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ University of the West of England thought policy should refer to support from one or more higher education institution being taken into account in the determination of planning applications, rather than being an explicit requirement. ● Defined locations and capping of bedspaces: <ul style="list-style-type: none"> ○ Unclear how locations have been identified and caps set. ○ Concern approach may be overly restrictive and counter-productive to other policy aims, e.g. uncapped student accommodation in Bristol Shopping Quarter and Frome Gateway could add to their vitality. ○ Caps should be referred to as indicative capacities or removed. ● Defined locations - University of Bristol precinct: 	<ul style="list-style-type: none"> ● Defined locations and capping of bedspaces: <ul style="list-style-type: none"> ○ Locations identified based on assessment of suitability and bed space levels set based on assessment of appropriate bed space density. ○ Draft policy considered to achieve an appropriate balance between meeting the accommodation needs of the city’s growing student population and ensuring adverse effects on existing communities are avoided. Approach maintained for Publication Version Policy H7. ○ Approach to bedspace caps considered appropriate for reasons explained in above bullet point and introductory text to policy. ● Defined locations - University of Bristol precinct: <ul style="list-style-type: none"> ○ Draft policy considered to achieve an appropriate balance between

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Objection to proposed additional bedspaces as existing amount of students considered to be causing harmful impacts. ● Defined locations - Clifton campus: <ul style="list-style-type: none"> ○ Objection as would not result in a sustainable increase in purpose-built student accommodation. ● Defined locations – Stoke Bishop: <ul style="list-style-type: none"> ○ Objection as would exacerbate existing amenity impacts: parking, highway safety, congestion, character, noise, litter, air pollution and anti-social behaviour. ○ Lack of clarity on where the bedspaces will be built, therefore concern at potential loss of open space and character of local area. ○ Bedspace cap should be lower. ○ Concern about ability of infrastructure to support growth. 	<p>meeting the accommodation needs of the city’s growing student population and ensuring adverse effects on existing communities are avoided. Approach maintained for Publication Version Policy H7.</p> <ul style="list-style-type: none"> ● Defined locations - Clifton campus: <ul style="list-style-type: none"> ○ Publication Version Policy H7 amended to ensure any additional development brought forward at Clifton residential campus is subject to a comprehensive masterplan and does not give rise to significant additional demand for on-street parking. ● Defined locations – Stoke Bishop: <ul style="list-style-type: none"> ○ Publication Version Policy H7 amended to ensure any additional development brought forward at Stoke Bishop residential campus is subject to a comprehensive masterplan. This would include measures to ensure a sustainable approach to development with no loss of existing on-site parking and any significant increased pressure for on-street parking controlled through specific measures to be agreed with the council.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Defined locations – Temple Quarter and St Philip’s Marsh: <ul style="list-style-type: none"> ○ Clarity sought on evidence for how number of bedspaces proposed (3,000) was identified. Understood area expected to accommodate 3,500 students. ○ Number too high. • Defined locations – Bristol Shopping Quarter (Broadmead) and Frome Gateway: <ul style="list-style-type: none"> ○ 500 cap threshold for Frome Gateway inappropriate given developer interest, therefore flexibility needed. ○ Query whether Frome Gateway is appropriate location as relatively isolated from University of Bristol (487), also may have negative impacts on operations of existing commercial uses; ○ Unclear how cap would be implemented, e.g. 500 bedspaces for each location? 	<ul style="list-style-type: none"> • Defined locations – Temple Quarter and St Philip’s Marsh: <ul style="list-style-type: none"> ○ Bedspace figure has been increased and based on assessment of appropriate bed space density. • Defined locations – Bristol Shopping Quarter (Broadmead) and Frome Gateway: <ul style="list-style-type: none"> ○ Bedspace figures have been set based on assessment of appropriate bed space density. ○ Location considered suitable given its proximity to city centre and good accessibility by sustainable transport modes to other parts of the city. The area is also subject to Local Plan Publication Version Policy DS5 ‘Frome Gateway’. This expects development to accord with a regeneration framework which will coordinate the approach to development across the area. This will include an assessment of potential impacts of development proposals on existing uses and occupiers. ○ Publication Version Policy H7 has been amended to separate the two locations and set individual bed space limits.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Defined locations – Central Bedminster: <ul style="list-style-type: none"> ○ Increase threshold / capacity to 1,350. ○ Concern that proposals within area already far exceed proposed cap. • Defined locations – Western Harbour: <ul style="list-style-type: none"> ○ University of the West of England (408) thought Western Harbour area should be expanded to include Bower Ashton Campus as they are reviewing student accommodation provision for their City Campus. • Lack of evidence to support reference to proposals for purpose-built student accommodation that exceed 1000 bed spaces within 200 metres of the site likely to result in harm in commercial areas. • Mix of uses: <ul style="list-style-type: none"> ○ should be promoted as per previous draft policy ULH6. ○ University of Bristol suggested policy re-wording to expect mixed-uses unless there is evidence to demonstrate it is 	<ul style="list-style-type: none"> • Defined locations – Central Bedminster: <ul style="list-style-type: none"> ○ Bedspace figure has been increased and based on assessment of appropriate bed space density. • Defined locations – Western Harbour: <ul style="list-style-type: none"> ○ Proposals for student accommodation in draft policy not taken forward in Publication Version Policy H7. • Draft policy approach considered appropriate for reasons set out in introductory text. General approach maintained for Publication Version Policy H7 with refinements and clarifications made to assist with application of the policy. • Mix of uses: <ul style="list-style-type: none"> ○ Publication Version Policy H7 promotes purpose-built student accommodation as part of mixed-use proposals in locations other than those specified in the policy. ○ Draft policy amended for Publication Version Policy H7 to make clear that purpose-built student accommodation should form part of mixed-use

Main issues raised	How they were addressed
<p>unviable, impractical or otherwise undesirable on planning grounds.</p> <ul style="list-style-type: none"> • Clarification sought on wording / terminology: ‘primarily residential context’; ‘adverse impact’; ‘harmful concentrations’; ‘strong residential context’; ‘commercial areas’; ‘good standard of accommodation’ and ‘surrounding communities’. • Affordable student housing requirement: <ul style="list-style-type: none"> ○ Unclear whether requirement applies to ‘other locations’ as well as ‘defined locations’. ○ Lack of evidence, and viability-testing to justify approach and target as appropriate. ○ 30% target should be increased to 50%. ○ University of the West of England considered 30% requirement overly prescriptive. They also thought it likely to impact viability, as did University of Bristol. They favoured a flexible approach undertaken on a 	<p>developments in these locations where feasible and appropriate.</p> <ul style="list-style-type: none"> • Amendments made to Publication Version Policy H7 to clarify policy wording and explanatory text. • Affordable student housing requirement: <ul style="list-style-type: none"> ○ Draft policy considered sufficiently clear through its reference to affordable student housing requirement applying to the ‘above’ locations, i.e. those specified in the preceding part of the policy. This has been maintained for Publication Version Policy H7. ○ Draft policy approach and target considered appropriate with reasoning provided in supporting text. Approach maintained for Publication Version Policy H7. Local Plan Publication Version supported by viability assessment.

Main issues raised	How they were addressed
<p>case-by-case basis which assessed evidenced need, with the support of the University (or other establishment) an important factor in assessing whether the proposal effectively addresses identified need.</p> <ul style="list-style-type: none"> • South Gloucestershire Council thought lack of areas identified for University of the West of England student accommodation development meant potential increased student housing pressure in areas of South Gloucestershire. SGC sought joint work with BCC to develop a complementary approach. 	<ul style="list-style-type: none"> • Publication Version Policy H7 provides an appropriate approach to the provision of purpose-built student accommodation informed by an assessment of the projected growth of student numbers to 2040. The Local Plan will be reviewed within five years of its adoption. This review will be informed by results of the on-going monitoring of the supply of bed spaces against projected student accommodation needs within Bristol, as explained in supporting text to Publication Version Policy H7.

Draft Policy H8: Older peoples’ and other specialist needs housing

Table 82 - main issues raised on Draft Policy H8: Older peoples’ and other specialist needs housing and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • References to 60 dwellings or more and a minimum of 10% affordable specialist housing: <ul style="list-style-type: none"> ○ Lack of evidence and viability-testing to justify approach. ○ More flexibility needed for site-specific 	<p>Amendments made to Local Plan Publication Version Policy H8 ‘Older people’s and other specialised needs housing’ to make clear that the 10% contribution will be sought from only extra care housing or housing-with-care schemes of the relevant size.</p> <p>Where, for reasons of viability, the applicant considers that the minimum percentage cannot be achieved, text has also been added to expect the applicant to demonstrate whether particular circumstances justify the need for a viability</p>

Main issues raised	How they were addressed
<p>circumstances where 10% affordable unviable.</p> <ul style="list-style-type: none"> ○ Provision of alternative housing types should be allowed where not viable to provide affordable housing. ○ Rationale for affordable housing provision should be same as for other types of housing; ○ Concern about lack of clarity on what constitutes affordable accommodation and practicalities of managing the affordable units. 	<p>assessment and provide full development appraisals to evidence an alternative affordable housing provision.</p> <p>Explanatory text has also been added to set out the circumstances where a financial contribution in lieu of on-site provision may be appropriate.</p> <p>Local Plan Publication Version supported by viability assessment.</p>

Draft Policy H9: Accessible homes

Table 83 - main issues raised on Draft Policy H9: Accessible homes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Lack of viability-testing and evidence to justify approach on optional standards and how 10% and 100% targets have been reached. ● Revise policy to reflect Government’s Planning Practice Guidance that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the Local Authority 	<p>Draft policy approach considered appropriate for reasons set out in its introductory text and based on latest evidence of need. General approach maintained for Local Plan Publication Version Policy H9 ‘Accessible homes’ with updates reflecting the Government’s Planning Practice Guidance. Local Plan Publication Version supported by viability assessment.</p>

Main issues raised	How they were addressed
<p>is responsible for allocating or nominating a person to live in that dwelling.</p> <ul style="list-style-type: none"> • More flexible approach needed to address individual site circumstances / constraints. 	

Draft Policy H10: Planning for traveller sites

Table 84 - main issues raised on Draft Policy H10: Planning for traveller sites and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Appropriate locations for plots or pitches should exclude Local Green Space, Reserved Open Space and the grounds and setting of historic buildings. • Policy should be extended to include assessment of van-dwellers needs. • South Gloucestershire Council thought greater regard should be given to National Planning Policy for Travellers Sites and its aim that current and future needs should be met. • Environment Agency thought policy should refer to avoiding areas of flood risk. 	<ul style="list-style-type: none"> • Provisions of draft policy considered suitable for ensuring the appropriate assessment of proposals and these have been maintained for Local Plan Publication Version Policy H10 'Planning for traveller sites'. All other relevant development plan policies and considerations will also apply to the assessment of proposals. • Draft policy considered to be in accordance with national planning policy. Approach maintained for Publication Version Policy H10. • Draft policy considered to be in accordance with national planning policy. Approach maintained for Publication Version Policy H10. • Provisions of draft policy were considered suitable for ensuring the appropriate assessment of proposals and these have been maintained for Publication Version Policy H10. All other relevant development plan policies and considerations will also apply to the assessment of proposals.

Economy

Table 85 - main issues raised on Economy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Objection to downgrading of employment provision in South Bristol as mixed-use development not considered to guarantee new employment provision. • Lack of evidence base to justify employment land approach. • Objection to lack of policy similar to existing Policy DM12 which deals with proposals resulting in loss of employment floorspace outside of designated industrial areas. • Economic importance of Bristol Airport insufficiently referenced. 	<ul style="list-style-type: none"> • Local Plan Publication Version E2 ‘Economic development land strategy’ explains that South Bristol will remain a priority focus for development and regeneration. Around 150 hectares of land will continue to be reserved for industry across eighteen industry and distribution areas. New land is proposed for industry and warehousing at Vale Lane, while new workspace will also be created in the areas of growth and regeneration and as part of mixed-use development on development allocations. • Local Plan Publication Version E2 ‘Economic development land strategy’ informed by published evidence. • Policy DM12 approach not being taken forward in Local Plan Publication Version. Instead, its policies seek to secure sustainable economic and inclusive growth through allocation of new workspace (Policy E2 ‘Economic development land strategy’), retention of core industrial land (Policy E5 ‘Industry and Distribution Areas’) and provision of new and affordable workspace as part of new and mixed-use development proposals (policies E6A ‘New workspace within mixed use development’ and E6 ‘Affordable workspace’). • Airport not located within administrative area of Bristol City Council.

Draft Policy E1: Inclusive economic development

Table 86 - main issues raised on Draft Policy E1: Inclusive economic development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern about impacts on development viability. • No targets for employment land provision. • More clarity needed for policy implementation. • Lack of policy on tourism. • Development thresholds at which policy would apply: <ul style="list-style-type: none"> ○ No evidence to justify them. ○ Too onerous and wide ranging. ○ Should only apply to major or super-major development. 	<ul style="list-style-type: none"> • Local Plan Publication Version supported by viability assessment. • Targets included in Local Plan Publication Version Policy E2 ‘Economic development land strategy’. • Addressed with additional text added to explanatory text of Local Plan Publication Version Policy E1 ‘Inclusive economic development’. • Tourism addressed in various Local Plan Publication Version policies including the City Centre policies of ‘Development Strategy’ chapter and the ‘Centres, shopping, and the evening economy’ chapter. • Thresholds amended for Local Plan Publication Version Policy E1. Considered appropriate for reasons set out in supporting text to policy. Also reflects the council’s guidance ‘Delivering Employment and Skills through Development – a guide for applicants and developers’.

Draft Policy E2: Employment land strategy

Table 87 - main issues raised on Draft Policy E2: Employment land strategy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Inadequate employment land provision for South Bristol. 	<ul style="list-style-type: none"> • Local Plan Publication Version E2 ‘Economic development land strategy’ explains that South Bristol will remain a priority focus for development and regeneration. Around 150 hectares of land will continue to be reserved for industry across eighteen industry and distribution areas. New land is proposed for industry and warehousing at Vale Lane, while new workspace will also be created in the areas of growth and regeneration and as

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Employment land targets needed. • Requirement to provide workspaces within mixed-use developments could lead to unviable development in areas lacking demand. • Lack of evidence to support policy. • No reference to Bristol Airport. • Set targets for amount of workspace to be provided on each Industry and Distribution Area through mixed-use development • Concern over loss of existing Principal Industrial and Warehousing Areas (PIWAs) and potential negative economic implications. • Concern that approach may favour higher-skilled employment over lower-skilled. • Considered inappropriate for industry to re-locate to Avonmouth due to lack of sustainable and low-cost 	<ul style="list-style-type: none"> part of mixed-use development on development allocations. • Strategic policy approach to the scale and location of new workspace to be delivered over the plan period set out in Publication Version Policy E2 'Economic development land strategy'. • Approach considered reasonable for reasons set out in draft policy. Approach maintained for Publication Version Policy E2. • Scale and location of new workspace to be delivered over the plan period set out in Publication Version Policy E2 'Economic development land strategy', which is supported by published evidence. • Airport not located within administrative area of Bristol City Council. • Not considered necessary to set such targets as appropriate provision will depend on a number of factors including site specific considerations. • Aim of Publication Version Policy E2 is to secure sustainable and inclusive economic growth through the development of new workspace and retention of core industrial land. • Draft policy promoted a diversity of workspace types in different locations across the city. This is expected to lead to a wide variety of employment opportunities. Approach maintained for Publication Version Policy E2. • Publication Version Policy E2 refers to the substantial amount (237 hectares) of Industrial and Distribution Areas which are proposed to be reserved for industry in areas

Main issues raised	How they were addressed
<p>transport.</p> <ul style="list-style-type: none"> Identify Broadmead for new workspace and office development. 	<p>outside of Avonmouth. Therefore it is not accepted that industry will have to re-locate to Avonmouth.</p> <ul style="list-style-type: none"> This is considered to be addressed with the reference in Publication Version Policy E2 to office and other main town centre workspace uses being focussed on the city centre.

Draft Policy E3: Location of office development

Table 88 - main issues raised on Draft Policy E3: Location of office development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Set targets for office floorspace. Definition of office space needed. General need for South Bristol employment workspace. Identify Broadmead for new workspace and office development. 	<ul style="list-style-type: none"> Target set out in Local Plan Publication Version Policy E2 'Economic development land strategy'. Provided in supporting text to policy. Local Plan Publication Version policies in the 'Economy and inclusive growth' chapter provide appropriate references to South Bristol as a priority focus for development and regeneration, for example within the explanatory text of Policy E2. Around 150 hectares of land will continue to be reserved for industry across eighteen industry and distribution areas. New land is proposed for industry and warehousing at Vale Lane, while new workspace will also be created in the areas of growth and regeneration and as part of mixed-use development on development allocations. This is considered to be addressed with the reference in Publication Version Policy E2 to office and other main town centre workspace uses being focussed on the city centre.

Draft Policy E4: Industry and Distribution Areas

Table 89 - main issues raised on Draft Policy E4: Industry and Distribution Areas and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern that policy erodes protection for employment areas. • Policy should recognise opportunities within Industry and Distribution Areas for mixed-use development. • Concern about proposal to remove designation as a protected industrial location for the area which includes Lawrence Hill bus depot. • Proposed designation of Barton Hill Trading Estate considered too restrictive over types of uses. • Amend Hawkfield Business Park boundary to reflect latest development activity. • Separate Agent of Change policy needed. 	<ul style="list-style-type: none"> • Draft policy explains that the areas identified represent the core provision of industrial and distribution land outside Avonmouth. Approach maintained for Local Plan Publication Version Policy E5 'Industry and Distribution Areas'. • Publication Version Policy E5 identifies these areas as being of strategic economic importance. They are therefore reserved for industry and other uses referred to in the policy. • Local Plan Publication Version policies DS6 'Lawrence Hill' and T2A 'Protected transport and movement routes' make clear that bus depots should be retained unless demonstrated that they are no longer required. • Area designated due to its strategic economic importance. Publication Version Policy E5 provides for a wide variety of business uses that would be appropriate in these locations. • Boundary amended for Publication Version. • Issue addressed adequately in draft policy. Approach maintained for Publication Version Policy E5 'Industry and Distribution Areas'.

Draft Policy E5: Avonmouth Industrial Area and Bristol Port

Table 90 - main issues raised on Draft Policy E5: Avonmouth Industrial Area and Bristol Port and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of recognition of Bristol Port’s importance. • Further consideration needed on suitability of Avonmouth for small to medium sized businesses, given dominance of large scale distribution operations. • Remove designation from strip of land adjacent to railway line and Portview Road. 	<ul style="list-style-type: none"> • Addressed in amended text to Local Plan Publication Version Policy E4 ‘Avonmouth Industrial Area and Bristol Port’. • Publication Version Policy E4 supportive of wide range of business sizes and types. • Designation considered appropriate.

Draft Policy E6: Protecting living conditions in Avonmouth village

Table 91 - main issues raised on Draft Policy E6: Protecting living conditions in Avonmouth village and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of evidence to justify policy. 	<ul style="list-style-type: none"> • Draft proposal not taken forward. Local Plan Publication Version contains a number of policies which will ensure potential harmful impacts of development proposals are adequately considered and addressed. These include policies HW1 ‘Pollution control and water quality’, HW2 ‘Air quality’, HW1A ‘Noise’ and HW1B ‘Contaminated land’.

Draft Policy E7: New workspace within mixed use development

Table 92 - main issues raised on Draft Policy E7: New workspace within mixed use development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Clarity sought on: <ul style="list-style-type: none"> ○ amount and type of workspace to be provided. ○ whether policy applies in Growth 	<ul style="list-style-type: none"> • Additional text provided in Publication Version Policy E6A ‘New workspace within mixed use development’.

Main issues raised	How they were addressed
<p>and Regeneration Areas.</p> <ul style="list-style-type: none"> ○ relationship between it and related policies. ● Include reference to live / work space. ● Provision of new workspace may not be viable in areas of low demand for such space. ● Lack of evidence to justify development size threshold to which policy will apply. ● New workspace required in South Bristol. 	<ul style="list-style-type: none"> ● Not considered necessary to make specific reference as focus of Publication Version Policy E6A is on workspace provision within mixed use development. ● Publication Version Policy E6A is considered to have an adequately justified approach to the redevelopment of brownfield sites for reasons set out in its supporting text. ● Thresholds in draft policy considered reasonable. Approach maintained for Publication Version Policy E6A. ● Local Plan Publication Version Policies in this chapter provide appropriate references to South Bristol as a priority focus for development and regeneration, for example within the supporting text to Policy E2 'Economic development land strategy'.

Draft Policy E8: Digital connectivity and inclusion

Table 93 - main issues raised on Draft Policy E8: Digital connectivity and inclusion and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Concern that policy expectations might not be achievable for all development without affecting its viability. ● Clarify size of development policy applies to. ● Requirement for Connectivity Statements considered onerous as issue can be addressed 	<ul style="list-style-type: none"> ● Approach considered appropriate for reasons set out in supporting text to draft policy. Approach maintained for Local Plan Publication Version Policy E8 'Digital connectivity and inclusion'. ● Policy considered clear. ● Connectivity Statements can be included within Planning Statements.

Main issues raised	How they were addressed
through Planning Statements.	

Retained policies

Table 94 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • BCAP11 'University and hospital development': <ul style="list-style-type: none"> ○ Suggest similar policy provision to cover Bower Ashton campus. ○ Should be expanded to offer greater flexibility in enabling the development of educational and ancillary uses associated with the University of Bristol. • BCAP12 'Vacant sites and temporary uses': Extend policy beyond city centre. 	<ul style="list-style-type: none"> • BCAP11: <ul style="list-style-type: none"> ○ Planning applications for development at Bower Ashton Campus will be assessed against all relevant development plan policies and other considerations. ○ Approach to development in this location covered in Local Plan Publication Version Policy DS1 'Bristol City Centre'. • Addressed in Local Plan Publication Version Policy SSE5 'Temporary uses in centres'.

Shopping, Services and the Evening Economy

Table 95 - main issues raised on Shopping, Services and the Evening Economy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Objection to lack of amended / new shopping areas / retail centres policies given rapid retail market changes. • More recognition needed on importance of local retail particularly for its 	<ul style="list-style-type: none"> • New centres have been added to the Local Plan Publication Version; Policy SSE1 'Supporting Bristol's Centres - network and hierarchy' refers. • Importance of local retail centres set out in Local Plan Publication Version policies SSE1 'Supporting Bristol's Centres - network and

Main issues raised	How they were addressed
<p>accessibility benefits, with Stokes Croft area emphasised.</p> <ul style="list-style-type: none"> • Any proposed new centre and primary shopping boundaries should reflect recent planning permissions, with Broadwalk Shopping Centre redevelopment scheme referenced. • Important that retained policies list after Policy DM8 (Shopping Areas and Frontages) continues to reference Policy Advice Note 8 (PAN8) "Shopfront Guidelines" (1997). 	<p>hierarchy' and SSE2 'Development in Bristol's centres'. Approach to Stokes Croft addressed in Policy SSE2. This sets out that the emphasis of new development in this location will be on retaining a mix of uses to maintain its character and sustainability.</p> <ul style="list-style-type: none"> • New centres and primary shopping area boundaries are set out in Publication Version policies SSE1 'Supporting Bristol's Centres - network and hierarchy' and are based on appropriate assessment of their suitability. • Reference made in Local Plan Publication Version.

Retained policies

Table 96 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • BCS7 'Centres and Retailing': change to retail policies requested including consideration of role of Eastgate Retail Park. • DM7 'Town Centre Uses': amend policy to reflect economic reality and be supportive of potential conversions away from retail on the fringes of secondary retail areas. 	<ul style="list-style-type: none"> • BCS7 replaced by Local Plan Publication Policy SSE1 'Supporting Bristol's Centres - network and hierarchy' and other policies within the 'Centres, shopping, and the evening economy' chapter. The Local Plan approach to out of centre retail parks accords with national planning policy. • DM7 replaced by Local Plan Publication policies SSE1 'Supporting Bristol's Centres - network and hierarchy', SSE2 'Development in Bristol's centres' and SSE4 'Town centre first approach to development'.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • DM8 ‘Shopping Areas and Frontages’: amend policy to reflect economic reality and be supportive of potential conversions away from retail on the fringes of secondary retail areas / a more flexible mix of uses. • DM9 ‘Local Centres’: concern about impact of advertising on local economic development. • BCAP13 ‘Strategy for retail development in Bristol City Centre’: update evidence. • BCAP14 ‘Location of larger retail development in Bristol City Centre’: update evidence. 	<ul style="list-style-type: none"> • DM8 replaced by Local Plan Publication policies SSE1 ‘Supporting Bristol’s Centres - network and hierarchy’, SSE2 ‘Development in Bristol’s centres’ and SSE4 ‘Town centre first approach to development’. • Addressed by Local Plan Publication Version Policy AD1 ‘Advertisements’. • Updated approach set out in Local Plan Publication Version policies DS1 ‘Bristol City Centre’ and DS1A ‘Bristol City Centre – Broadmead, Castle Park and the Old City’, supported by policies in the Publication Version’s ‘Centres, shopping, and the evening economy’ chapter. • Updated approach set out in Local Plan Publication Version policies DS1 ‘Bristol City Centre’ and DS1A ‘Bristol City Centre – Broadmead, Castle Park and the Old City’, supported by policies in the Publication Version’s ‘Centres, shopping, and the evening economy’ chapter.

Green Infrastructure

Table 97 - main issues raised on Green Infrastructure and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Overall proportion of protected green space should increase as housing and population density increases. 	<ul style="list-style-type: none"> • 2019 consultation identified that a fifth of the city’s land area is given over to various forms of open space and that this overall proportion would be maintained in the Local Plan Review. This is the approach of the Local Plan Publication Version and is considered appropriate given the other aims and objectives of the plan, particularly

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • References should be made to wider role / benefits of Green Infrastructure, e.g. health and wellbeing, supporting wildlife, protecting townscape character, climate change and flood risk mitigation, improving air quality and protecting trees and woodland areas. • Protection of garden land. • References needed to blue infrastructure. • Tree canopy protection and enhancement. • Natural England considered that: <ul style="list-style-type: none"> ○ Green Infrastructure policies needed updating to reflect local and national ambitions, including the NPPF and 25 Year Environment Plan such as references to biodiversity net gain. ○ Green Infrastructure 	<p>around meeting the city’s strategic development needs.</p> <ul style="list-style-type: none"> • Policies addressing these issues were developed for the 2022 consultation and Local Plan Publication Version, for example within the ‘Biodiversity and Green Infrastructure’, ‘Net zero and climate’ and ‘Design and conservation’ chapters. • Addressed in Local Plan Publication Version Policy BG6 ‘Development of Private Gardens’. • References added to relevant sections of 2022 consultation and Local Plan Publication Version, including its ‘Biodiversity and Green Infrastructure’ chapter. • Addressed in 2022 consultation and Local Plan Publication Version Policy BG4 ‘Trees’. • Natural England comments: <ul style="list-style-type: none"> ○ Policies were updated for the 2022 consultation and included in Local Plan Publication Version. ○ Standards for green infrastructure provision included in Local Plan Publication Version Policy BG1 ‘Green Infrastructure and biodiversity’. These relate to Natural England’s Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023. ○ Specific reference made to nature recovery network made in Local Plan Publication Version Policy BG1 ‘Green Infrastructure and biodiversity in new

Main issues raised	How they were addressed
<p>standards should be included.</p> <ul style="list-style-type: none"> ○ Consideration be given to the evolving West of England work around nature recovery. ● Environment Agency sought reference to preserving the floodplain / making space for water. 	<p>development’.</p> <ul style="list-style-type: none"> ● Suitable references included in policies consulted on in 2022 and in Local Plan Publication Version Policy BG1 ‘Green Infrastructure and biodiversity in new development’.

Draft Policy GI1: Local Green Space

Table 98 - main issues raised on Draft Policy GI1: Local Green Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Criteria for Local Green Space designation too restrictive and contrary to national planning policy and guidance. ● All current and future allotments and smallholdings should be designated as Local Green Space. ● Provide more examples of types of ancillary development which may be allowed in Local Green Spaces. ● Green space along rivers should be given Local Green Space designation. 	<ul style="list-style-type: none"> ● Criteria considered suitable and in accordance with national planning policy. ● Criteria for Local Green Space designation was set out in draft policy and supporting ‘New Protection for Open Space – Consultation’ document. Statutory allotments subject to strict protections. Issue also addressed in Local Plan Publication Version Policy FS3 ‘The protection of existing food growing enterprises and allotments’. ● It is considered that sufficient examples were provided in supporting text to the draft policy and these have been maintained for Publication Version Policy GI1 ‘Local Green Space’. ● Criteria for Local Green Space designation was set out in draft policy and supporting ‘New Protection for Open Space – Consultation’ document. Approach has been maintained for Publication Version Policy GI1

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Due to lack of green space in areas such as Easton and Lawrence Hill, all green space should be designated as Local Green Space unless proven otherwise. • Query why some Green Belt areas are not given Local Green Space designation. 	<p>'Local Green Space'. Issue also addressed by Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.</p> <ul style="list-style-type: none"> • Not appropriate as would be contrary to national planning policy. • Both Green Belt and Local Green Space designation applied where appropriate criteria were met.

Draft Policy GI2: Reserved Open Space

Table 99 - main issues raised on Draft Policy GI2: Reserved Open Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Objection as no support for approach found in national planning policy. • Too restrictive approach given proposal to also protect Local Green Spaces and will be harmful to housing supply. • Policy wording unclear, e.g. how to demonstrate open space is no longer required. • Should merge approach so that both Local Green Spaces and Reserved Open Spaces receive similar protection. • Allotments should be designated as Local Green Space not Reserved Open Space. 	<ul style="list-style-type: none"> • Support for draft policy approach in national planning policy. Approach maintained for Local Plan Publication Version Policy GI2 'Reserved Open Green Space'. • Justification for approach provided in explanatory text to draft policy. Approach maintained for Publication Version Policy GI2. • Policy wording considered to be sufficiently clear. • Reasoning for approach provided in introductory text to both draft policies. Approach maintained for Local Plan Publication Version. • Criteria for Local Green Space designation was set out in draft policy and supporting 'New Protection for Open Space – Consultation' document. Statutory allotments subject to strict protections. Issue also addressed in Local Plan Publication Version Policy FS3 'The protection of existing food growing enterprises and allotments'.

Draft Policy GI3: Incidental Open Spaces

Table 100 - main issues raised on Draft Policy GI3: Incidental Open Spaces and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of clarity on Incidental Open Spaces definition. • Approach could inhibit housing delivery requirement through optimising density. 	<ul style="list-style-type: none"> • Definition considered to be sufficiently clear. • Justification for approach provided in explanatory text to draft policy. Approach maintained for Publication Version Policy GI2.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Amend policy to allow development where: <ul style="list-style-type: none"> ○ proposals would re-provide an appropriate level of open space in line with other policies in the Local Plan. ○ it can be demonstrated that benefit outweighs harm. 	<ul style="list-style-type: none"> • Draft policy wording considered appropriate and maintained for Publication Version Policy GI2.

Draft Policy GI4: Stapleton Allotments and Holdings – Food Growing Local Green Space

Table 101 - main issues raised on Draft Policy GI4: Stapleton Allotments and Holdings – Food Growing Local Green Space and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Extend policy approach to include all allotments and smallholdings. • South Gloucestershire Council noted the site was previously designated to accommodate a Park & Ride scheme for the M32 corridor. They considered a change in designation premature given importance of such a scheme is recognised within the Joint Local Transport Plan in support of the Joint Spatial Plan. 	<ul style="list-style-type: none"> • Statutory allotments subject to strict protections. Issue also addressed in Local Plan Publication Version Policy FS3 ‘The protection of existing food growing enterprises and allotments’. • Local Plan Publication Version Policy GI4 ‘Stapleton Allotments and Holdings – Food Growing Local Green Space’ considered appropriate for reasons set out in its supporting text. Any proposals for improvements in the M32 corridor can be considered as part of the Joint Local Transport Plan process.

Food systems

Table 102 - main issues raised on Food systems and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Need for a more comprehensive plan to protect nature-friendly food growing sites. 	<ul style="list-style-type: none"> Detailed coverage of this topic addressed in Local Plan Publication Version policies FS1 'The provision of allotments', FS2 'Provision of food growing space in new developments', Policy FS3 'The protection of existing food growing enterprises and allotments' and GI4 'Stapleton Allotments and Holdings – Food Growing Local Green Space'.

Retained policies

Table 103 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> BCS9: Green Infrastructure: More emphasis needed on increasing tree canopy cover. DM17: Development involving existing green infrastructure: Amendment needed requiring replacement of trees in such a way as to contribute to an overall doubling on site of tree canopy cover by 2046. DM19: Development and Nature Conservation: Amend policy approach towards biodiversity and achieving net gain. DM21: Development of Private Gardens: Strengthen policy wording. Should prevent conversion of gardens to hardstanding or synthetic grass and the loss of garden space to Electric Vehicle charging. 	<ul style="list-style-type: none"> Addressed in Local Plan Publication Version Policy BG4 'Trees'. Approach towards aim of extending city's tree canopy cover addressed in Local Plan Publication Version Policy BG4 'Trees'. Addressed in Local Plan Publication Version Policy BG3 'Achieving Biodiversity Gains', amongst others. Local Plan Publication Version includes Policy BG6 'Development of Private Gardens'. This maintains the approach of DM21 and is considered appropriate and proportionate. Policy BG1 'Green Infrastructure and biodiversity in new development' expects new development to not include artificial grass within their landscape schemes or as

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • BCAP25: Green infrastructure in city centre developments: Natural England noted this policy requires development to include an element of green infrastructure as integral part of design. They suggested where this was not possible a contribution to Green Infrastructure elsewhere would be justified. 	<p>part of the provision of private or communal open space.</p> <ul style="list-style-type: none"> • Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity' includes standards for green infrastructure provision in new development which relate to Natural England's Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023.

New Protection for Open Space – Consultation

Proposed Local Green Space designation

Table 104 - main issues raised on Proposed Local Green Space designation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Wessex Water requested removal of their assets from the site boundaries of a number of sites proposed for designation. • Amendments sought to boundaries of following sites: <ol style="list-style-type: none"> 1. New Cut Local Nature Reserve 2. Sheep Wood 3. Stoke Park Estate • Objection to proposed designation of following sites: <ol style="list-style-type: none"> 1. Wickham Glen Open Space 	<ul style="list-style-type: none"> • Amendments made where assets deemed not to be of public value for the purposes of Local Green Space designation. Designation will not affect maintenance work on assets. • Designation proposed in consultation considered appropriate. • Designation proposed in consultation considered appropriate.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> 2. Fields above Lawrence Weston Moor 3. Bedminster Down Common 	

Proposed Reserved Open Space designation

Table 105 - main issues raised on Proposed Reserved Open Space designation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Sites proposed for Reserved Open Space designation considered to meet criteria for Local Green Space designation: <ul style="list-style-type: none"> 1. Stoke Lodge 2. Blackswarth Road Wood 3. Elderberry Walk Open Space 4. Crox Bottom Green Space 5. Withywood Park 6. Colston's Field 7. Playground at School Road, Totterdown • Sites proposed for Reserved Open Space designation considered to meet criteria for Local Green Space designation: <ul style="list-style-type: none"> 1. Land at Windsor Place and The Paragon 2. St Werburgh's Park Open Space 3. Land at Maskelyne Avenue 	<ul style="list-style-type: none"> • Amendments made for Local Plan Publication Version to designate sites as Local Green Space. • Sites not considered to meet criteria for Local Green Space designation.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> 4. Land to the south of Cornwallis Crescent 5. Trym Valley Open Space, Southmead 6. May Hassell playing fields 7. Railway line north of Lockleaze Road 8. Colston School 9. Brixham Road Open Space 10. Dorian Road Playing Fields 11. Grittleton Road Allotments 12. Fairfield School Playing Field, Muller Road 13. Sir Johns Lane Allotments 14. Land at Boiling Wells 15. Land at Boiling Wells 16. Railway from Easton Road to Muller Road and Ashley Hill 17. Ashley Vale Allotments 18. Albion Road Amenity Area 19. Belle Vue Road Open Space 20. Former Wesley College 21. Lynmouth Road Allotments 22. Open Space at Eaton Crescent 23. Bristol and Bath Railway Path 	

Main issues raised	How they were addressed
<p>24. Bristol and Bath Railway Path adjacent to Owen Square Park</p> <p>25. Highway Land Portway</p> <p>26. Portway - land between Railway and River</p> <p>27. Park Place</p> <p>28. Dowry Square</p> <p>29. The Urban Park</p> <p>30. South Parade Gardens</p> <p>31. Avon View Cemetery</p> <p>32. Filwood Playing Fields</p> <p>33. Henbury Court Primary School</p> <p>34. Falcondale Road Allotments</p> <p>35. Westbury-on-Trym C of E Primary School</p> <p>36. The Coppice Open Space</p> <ul style="list-style-type: none"> • Sites considered inappropriate for designation: <ol style="list-style-type: none"> 1. Filton Golf club 2. Land to the east of Barkleys Hill 3. Land to the west of Barkleys Hill 4. Vyvyan Terrace • Amendments sought to boundaries of following sites: <ol style="list-style-type: none"> 1. Grove Road Open Space 2. Land Adjoining Tackley Road Garage 	<ul style="list-style-type: none"> • Designation proposed in consultation considered appropriate. • Designation proposed in consultation considered appropriate.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Sites suggested for Reserved Open Space designation: <ol style="list-style-type: none"> 1. Thomas Memorial (top of Whiteladies Road) 2. Victoria Rooms (fountain surround) 3. West end of Belgrave Hill 4. Lockleaze Housing Greens 5. Hengrove Park (30ha) 6. Land at Cherry Orchard Camphill Community 	<p>These sites considered as not meeting the criteria set out in the 2019 consultation to merit designation.</p>

Transport

Table 108 - main issues raised on Transport and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Strengthen policies: <ul style="list-style-type: none"> ○ Should include proposals for a Clean Air Zone, Workplace Parking Levy and parking controls. ○ Should have greater emphasis on tackling climate emergency, setting out how they will ensure sustainable development. • Lack of reference to taxi ranks. 	<ul style="list-style-type: none"> • The Local Plan Publication Version contains a suite of policies within its 'Transport' chapter to adequately address transport issues and improvements. For example, Policy T1 'Development and transport principles' sets out key matters that development proposals should address. Policy T2 'Transport infrastructure improvements' describes the major transport infrastructure enhancements planned for Bristol. A Clean Air Zone was introduced in 2022. • Any proposals for taxi ranks that require planning permission will be assessed against all relevant development plan policies and considerations.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policies need to address personal safety and accommodation in public spaces for women, pushchairs, wheelchairs, cyclists and pedestrians. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy T1 ‘Development and transport principles’ expects development to provide safe and accessible streets. Proposals should also create places and streets shaped by the needs of pedestrians, cyclists and public transport users. Development is also expected to make appropriate provision for the transport needs of disabled people. Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’ expects proposals to be inclusive, providing for equality of access and opportunity in its layout and design.

Draft Policy T1: Development and transport principles

Table 109 - main issues raised on Draft Policy T1: Development and transport principles and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Strengthen policy against use of private cars in light of climate emergency. Should aspire to make Bristol car free by 2030. • Policy wording unclear, e.g. meaning of ‘sustainable travel’. • Unclear relationships between policy, Bristol Transport Strategy, Joint Local Transport Plan 4 and evidence base documents. • Prohibit students from bringing cars to city except in specific circumstances. • Policy does not adequately consider impacts of increased housing density 	<ul style="list-style-type: none"> • Draft policy considered reasonable and proportionate. Approach maintained for Local Plan Publication Version Policy T1 ‘Development and transport principles’. • Wording considered clear. • Draft policy sets out key matters that development proposals should address. Approach maintained for Publication Version Policy T1. Other Publication Version transport policies refer to supporting plans and strategies where appropriate. • Approach to parking for purpose-built student accommodation schemes set out in Local Plan Publication Version Policy H7 ‘Managing the development of purpose-built student accommodation’. • Issue will be addressed by a number of Local Plan Publication Version policies including T1 ‘Development and transport principles’, T3A

Main issues raised	How they were addressed
<p>proposed by local plan.</p> <ul style="list-style-type: none"> • Make reference to cycle network improvements. • Require segregation of cycle and walking routes in new developments. • Policy should expect development to make appropriate provision for the transport needs of disabled people. 	<p>‘Transport development management’, DPM1 ‘Delivering well-designed, inclusive places’ and DC1 ‘Liveability in residential development including space standards, aspect and private outdoor space’.</p> <ul style="list-style-type: none"> • Addressed by Local Plan Publication Version policies T2 ‘Transport infrastructure improvements’ and T6 ‘Active travel routes’. • Approach to securing cycle and walking access and infrastructure improvements addressed by Local Plan Publication Version policies T2 ‘Transport infrastructure improvements’, T3A ‘Transport development management’ and T6 ‘Active travel routes’. • Addressed in wording in draft policy. Approach maintained for Local Plan Publication Version Policy T1 ‘Development and transport principles’.

Draft Policy T2: Transport schemes

Table 110 - main issues raised on Draft Policy T2: Transport schemes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy should safeguard railway sites / land for both committed projects and where improvements are needed in areas with significant population or employment. • Policy should include public transport improvements for poorly served areas. • Proposals insufficiently radical to meet aim of creating sustainable or low energy transport networks. • Concern about co-ordination of transport 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy T2 sets out the major planned enhancements to transport infrastructure in Bristol. These have been informed by supporting plans and strategies referred to in the policy. This includes the West of England Combined Authority’s Joint Local Transport Plan 4, which ensures strategic considerations have informed transport schemes. Policy T2A ‘Protected transport and movement routes’ safeguards land required to accommodate future improvements.

Main issues raised	How they were addressed
<p>schemes with strategic development.</p> <ul style="list-style-type: none"> • Suggestions for transport proposals to be included in policy: tram system; new bus network and facilities; use of road space to create green cycle corridors; introduction of Low Emission Zone; reopening of Clifton Rocks Railway; support for growth of Bristol Airport; South Bristol Orbital road; Callington link road; railway stations at Lockleaze, Horfield, Ashley Down, Filton North and Henbury to Shirehampton, Avonmouth Dock, St Andrews Road and Severn Beach; improved bus connectivity from central Bristol to north east fringe; additional and expanded park and ride sites; reallocation of road space to prioritise public transport, cycling and pedestrians; improved cycle routes from city centre to fringe. • Sites requested for safeguarding: Kingsland Road waste transfer station land and track bed (rail); Bristol East and West yards (rail); Barton Hill depot (rail); Malago Vale sidings, and container depot (rail); bus depots at Lawrence Hill and Hengrove. 	<ul style="list-style-type: none"> • Safeguarding of rail sites and transport depots addressed in Publication Version Policy T2A 'Protected transport and movement routes'.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • South Gloucestershire Council noted proposal to designate allotments in Stapleton as Local Green Space on a site previously identified for a Park & Ride scheme for the M32 corridor. They considered change in designation premature given importance of scheme is recognised within Joint Local Transport Plan. 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy GI4 ‘Stapleton Allotments and Holdings – Food Growing Local Green Space’ considered appropriate for reasons set out in its supporting text. Any proposals for improvements in the M32 corridor can be considered as part of the Joint Local Transport Plan process.

Draft Policy T3: Car and cycle parking provision for residential development

Table 111 - main issues raised on Draft Policy T3: Car and cycle parking provision for residential development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Parking standards: <ul style="list-style-type: none"> ○ Should be stated as maximum figures, not desirable targets. ○ Schedule needs updating. • Electric car charging points should be part of new developments. • All new office or housing development should have sufficient car club parking. 	<ul style="list-style-type: none"> • Approach to parking and electric vehicle infrastructure addressed in Local Plan Publication Version Policy T4A ‘Parking, servicing and the provision of infrastructure for electric vehicles’, which will be supported by guidance in the Transport Supplementary Planning Document. • Contributions to car club schemes will be sought where appropriate in accordance with Local Plan Publication Version Policy IDC1 ‘Development contributions and CIL’ and the Planning Obligations supplementary planning document.

Draft Policy T4: Cycle parking provision for B1 office development

Table 112 - main issues raised on Draft Policy T4: Cycle parking provision for B1 office development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Standards should be seen as a minimum with higher standards considered at favourable locations. • Rather than blanket approach, standards should apply according to development's location, e.g. based on forecasts of likely future modal share for cyclists from Transport Assessment. • One space per 50m² too low; should be one space per 40m². 	<p>Approach to cycle parking addressed in Local Plan Publication Version Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles', which will be supported by guidance in the Transport Supplementary Planning Document.</p>

Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles

Table 113 - main issues raised on Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of evidence to justify policy. • Too onerous and prescriptive and will negatively impact scheme viability. • Policy premature given absence of Government approach. • Passive provision approach inappropriate as does not demonstrate existence of infrastructure. • Concern policy encourages car journeys and will increase loss of private gardens. 	<p>Policy approach set out in Local Plan Publication Version Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles', which will be supported by guidance in the Transport Supplementary Planning Document.</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Proposal for 20% of car parking spaces to provide active charging: <ul style="list-style-type: none"> ○ Excessive and may result in underutilised facilities. ○ Should be 50%. 	

Retained policies

Table 114 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • DM23 'Transport Development Management': Policy needs to be supplemented with reference to Transport Development Management guide for developers. 	<ul style="list-style-type: none"> • Reference included in Local Plan Publication Version Policy T3A 'Transport development management'.

Community facilities

Retained policies

Table 115 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • BCS12 'Community Facilities and DM5 – Protection of Community Facilities': supporting text should be revised to make clear that cultural facilities are included within remit of these policies. • DM6 'Public Houses': Concern existing policy not being applied. 	<ul style="list-style-type: none"> • Cultural centres and venues are now referenced in introductory text to Local Plan Publication Version policies CF1 'Provision of community facilities' and CF2 'Retention of community facilities'. • The approach of Policy DM6 has been largely retained in the Local Plan Publication Version with Policy SSE8 'Public houses' including some additional explanatory text.

Climate Change and Sustainability

Draft Policy CCS1: Climate change, sustainable design and construction

Draft Policy CCS2: Towards zero carbon development

Draft Policy CCS3: Adaptation to a changing climate

Draft Policy CCS4: Resource efficient and low impact construction

Draft Policy CCS5: Renewable energy development

Table 116 - main issues raised on Draft Policies CCS1 – CCS5 and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Insufficiently ambitious. • Unclear meaning of ‘zero carbon’. • Inappropriate to include climate change as a separate section; should be ‘golden thread’ through the plan. • Insufficient reference to Climate Change Emergency. • Separate energy section needed, setting out city’s vision for energy generation, storage and distribution. • Lack of evidence and viability-testing to justify requirements. • Audit of predicted carbon emissions over plan’s lifetime needed and should be monitored. • Environment Agency thought there was insufficient reference to flood risk. 	<p>The suite of Climate Change and Sustainability policies in the 2019 local plan consultation are no longer being progressed. Following the consultation, emerging evidence, the Covid-19 pandemic and changes to the approach to strategic regional planning meant that the decision was made to review the entire local plan. As part of this process, an entirely new suite of policies is proposed that will better address the climate emergency.</p> <p>These policies address the operational energy use of new development, embodied carbon, adaptation to climate change through design, energy efficiency and the provision of new renewable energy generation capacity both at scale and within individual buildings.</p> <p>Comments received in the 2019 consultation, although relating to the previous policies were used to inform the development of the new ‘Net Zero and Carbon’ Local Plan chapter.</p> <p>These policies reflect an up-to-date and extensive evidence base, including works commissioned by the council directly.</p>

Flood Risk and Water Management - Retained policies

Table 117 - main issues raised on Flood Risk and Water Management - Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> BCS16 'Flood Risk and Water Management': text from BCS16 should be applied to all proposed development allocations. 	<ul style="list-style-type: none"> Allocations set out in the Local Plan Publication Version contain references to flood risk issues and required measures where appropriate.

Design and Conservation

Table 118 - main issues raised on Design and Conservation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Historic England emphasised importance of Local Plan addressing opportunities to enhance heritage assets and Conservation Areas, particularly using up-to-date evidence. 	<ul style="list-style-type: none"> Addressed in Local Plan Publication Version Policy CHE1 'Conservation and the historic environment'.

Draft Policy DC1: Liveability in residential development including space standards

Table 119 - main issues raised on Draft Policy DC1: Liveability in residential development including space standards and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Concern about lack of evidence to justify the policy's approach, particularly on the potential for negative impacts on the viability of development proposals. Definition sought on terms used in policy: 'short-' and 'long-term occupancy', 'occupier groups' and 	<ul style="list-style-type: none"> Support for policy approach in NPPF. Local Plan supported by viability assessment. References to short-term and occupier groups removed from Local Plan Publication Version Policy DC1 'Liveability in residential development including space standards and

Main issues raised	How they were addressed
<p>'liveability'.</p> <ul style="list-style-type: none"> • Policy should be sufficiently flexible to determine appropriate density on a site-by-site basis at planning application stage. • Important that retained design policies and Policy Advice Note guidance is referenced in policy text. • Concern about appropriateness of Urban Living supplementary planning document being used to underpin requirements of local plan policy, e.g. the standards / requirements in the SPD have not been viability tested in the way that a Local Plan policy would be. • Minimum space standards: <ul style="list-style-type: none"> ○ Caveat needed for co-housing and community living proposals, which may require flexibility on minimum space standards. 	<p>private outdoor space'. Long-term occupancy explained in policy wording with reference to Use Class C3 schemes. Liveability considerations referred to in Publication Version Policy DPM1 'Delivering well-designed, inclusive places', and Urban Living Supplementary Planning Document.</p> <ul style="list-style-type: none"> • Policy DC1 aims to ensure development proposals develop land to its optimum density. Flexibility is provided in policy wording with reference to need for proposals to create a liveable environment having regard to all other relevant policies in the plan. This includes Policy UL2 'Residential densities', which provides more detail on how appropriate density will be assessed. • Local Plan Publication Version Policy CHE1 'Conservation and the historic environment' refers to supporting policy guidance and advice that will continue to be used to guide decisions on development proposals. • Considered appropriate for detailed guidance on the application of Local Plan policy to be provided by Supplementary Planning Document. Local Plan supported by viability assessment. • Minimum space standards: <ul style="list-style-type: none"> ○ Supporting text to Policy DC1 explains that standards may not be necessary for specialist forms of accommodation. ○ Minimum space standards are considered key to urban living approach, i.e. one that balances the efficient and effective use of land with making quality places to live.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Concern they will affect housing delivery. ● Private outdoor space: <ul style="list-style-type: none"> ○ Lack of evidence and reasoning to justify policy. ○ May not be feasible without impacting on dwelling number capacity and residential amenity. ● Sport England advocated reference to its Active Design guidance and developer's checklist and suggested a model policy. 	<ul style="list-style-type: none"> ● Private outdoor space: <ul style="list-style-type: none"> ○ Appropriate private outdoor space provision considered to be key to urban living approach, i.e. one that balances the efficient and effective use of land with making quality places to live. ● Ensuring development proposals promote or provide opportunities for physical activity are addressed in a number of Local Plan Publication Version policies including Policy DPM1 'Delivering well-designed, inclusive places'; Policy T1 'Development and transport policies' and Policy T6 'Active travel routes'.

Draft Policy DC2: Tall buildings

Table 120 - main issues raised on Draft Policy DC2: Tall buildings and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Objections included concerns about detrimental impacts on heritage and character, as well as wellbeing through social isolation. Also doubts as to whether they are an effective means of increasing density. ● Reference should be made to proposals avoiding masking topography as a way of protecting views across the city. 	<ul style="list-style-type: none"> ● Local Plan Publication Version Policy DC2 'Tall buildings' sets out criteria to ensure important planning considerations are appropriately considered in determining tall building applications. ● Supporting text to Policy DC2 explains that Landscape and Visual Impact Assessments will be necessary to enable the visual impact of tall buildings from near and distant viewpoints to be assessed.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More clarity needed on: <ul style="list-style-type: none"> ○ preferred location of tall buildings, e.g. shown on a map or within the policy text; and ○ evidence documents that will be required to support planning applications, e.g. daylighting, overshadowing, wind and security assessments. 	<ul style="list-style-type: none"> • Clarity requests: <ul style="list-style-type: none"> ○ Policy DC2 provides locational guidance with focus on areas identified as suitable for most intensive forms of development or as identified in policies for specified regeneration areas. ○ Explanatory text to Policy DC2 refers to expectations for supporting information required, e.g. Landscape and Visual Impact Assessments, Design and Access Statements, plus signposts to additional guidance provided in the Urban Living Supplementary Planning Document.

Draft Policy DC3: Local Character and Distinctiveness

Table 121 - main issues raised on Draft Policy DC3: Local Character and Distinctiveness and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Need for policy to address issues relating to negative impacts of outdoor advertising / billboards. • Inconsistency between this and the tall buildings policy, particularly relating to the requirement that proposals should complement the scale of existing buildings. • Concern that policy is biased against areas which are already higher density, as it requires development to complement existing scale and massing. 	<ul style="list-style-type: none"> • Addressed in Local Plan Publication Version Policy AD1 'Advertisements'. • Aspects of Draft Policy DC3 have been incorporated into Publication Version Policy DPM1 'Delivering well-designed, inclusive places'. Both DPM1 and Publication Version Policy DC2 'Tall buildings' will ensure proposals for tall buildings are appropriately assessed, having regard to matters including the location and context of the development site and the proposal's design. • Aspects of Draft Policy DC3 have been incorporated into Publication Version Policy DPM1 'Delivering well-designed, inclusive places'. Reference to complementing existing scale and massing has been removed.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More clarity sought on the locations where ‘innovative design solutions’ could be appropriate, e.g. some Outer Urban Areas. 	<ul style="list-style-type: none"> • Aspects of Draft Policy DC3 have been incorporated into Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’. Reference to innovative design solutions has been removed.

Retained Policies

Table 122 - main issues raised on Retained Policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • BCS21: Quality Urban Design: Reference to Building for Life Very Good standard now out of date. • DM27: Layout and Form: Text relating to height, scale and massing requires development to ‘be appropriate to the immediate context.’ This appears contradictory to draft policies DC2 and DC3. • DM29: Design of New Buildings: Concern about its lack of reference to issues relating to proposals for the display of advertisements. • BCAP30: Pedestrian routes: Map accompanying policy needs updating with: <ul style="list-style-type: none"> ○ routes completed since 2015; ○ newly proposed routes from City Centre Framework and West of England Local Cycling and Walking 	<ul style="list-style-type: none"> • Local Plan Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’ refers to the latest relevant guidance, which includes the National Design Guide. • Ensuring development proposals adequately address site context are important considerations in Local Plan Publication Version Policies DPM1 ‘Delivering well-designed, inclusive places’; DC1 ‘Liveability in residential development including space standards and private outdoor space’; and DC2 ‘Tall buildings’. • Addressed in Local Plan Publication Version Policy AD1 ‘Advertisements’. • The approach of Policy BCAP30 has been incorporated into a number of policies in the Local Plan Publication Version. For example: <ul style="list-style-type: none"> ○ In the Central Bristol section of the ‘Development Strategy’ chapter, each area policy makes reference to development including measures to secure public access and routes for walking. ○ Policy T2 ‘Transport infrastructure improvements’ highlights the provision of safe and attractive

Main issues raised	How they were addressed
<p>Infrastructure Plan; and</p> <ul style="list-style-type: none"> ○ proposals for routes connecting new strategic development areas within walking distance of the centre. <ul style="list-style-type: none"> ● BCAP32: Quayside walkways: Environment Agency stated that quayside walkways need to ensure harbour walls can be inspected in the interest of flood risk management. 	<p>walking routes and references the plans and strategies which will deliver these enhancements.</p> <ul style="list-style-type: none"> ○ Policy T3A 'Transport development management' expects development to provide for pedestrians including, where appropriate, enhancing the pedestrian network. ○ Policy T6 'Active travel routes' will also ensure that the function and amenity of Active Travel Routes is protected. This is supported by the expectation that proposals adjacent to the Active Travel Route network should, where possible, provide connections with existing or proposed routes. <ul style="list-style-type: none"> ● Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways' includes reference to ensuring development proposals enable long-term safe access, stewardship and maintenance of waterways and watersides.

Health and Wellbeing

Table 123 - main issues raised on Health and Wellbeing and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Policies needed on: <ul style="list-style-type: none"> ○ advertisement displays; ○ Social Value; ○ Provision of education and nursery provision and children's play. 	<ul style="list-style-type: none"> ● Addressed by: <ul style="list-style-type: none"> ○ Local Plan Publication Version Policy AD1 'Advertisements'. ○ Local Plan Publication Version Policy SV1 'Social value and inclusion'. ○ Local Plan Publication Version policies IDC1 'Development contributions and CIL' and GI A 'Open Space for Recreation'.

Pollution

Draft Policy HW1: Pollution Control and Water Quality

Table 124 - main issues raised on Draft Policy HW1: Pollution Control and Water Quality and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Revise policy to require applicants to submit an Agent of Change Statement demonstrating ongoing viability of existing uses will not be threatened. • Clarification sought on terms used, e.g. what type of development is meant by ‘considered desirable for reasons of economic or wider social need’. • Wessex Water sought specific reference to Sewage Treatment Works and Pumping Stations requiring protection from undue operational constraints. 	<ul style="list-style-type: none"> • This is considered to be satisfactorily addressed with the policy’s requirement that relevant proposals should include measures to mitigate the impact of existing pollution on future occupiers. This can be addressed in the Design and Access Statement or other supporting documentation. • Policy text provides examples of music venues and industrial uses. • Not considered necessary or appropriate to make specific reference to these matters. Local Plan Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’ ensures that new development has regard to the built environment context and assets of each site.

Draft Policy HW2: Air Quality

Table 125 - main issues raised on Draft Policy HW2: Air Quality and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy should be strengthened: <ul style="list-style-type: none"> ○ references to PM10 should also include PM2.5. ○ require an Air Quality Assessment in planning applications. 	<ul style="list-style-type: none"> • Strengthening of policy: <ul style="list-style-type: none"> ○ Reference not included in the Local Plan Publication Version Policy HW2 ‘Air quality’ as not considered to make a substantive difference to the proposed policy approach. ○ Addressed in supporting text which refers to an air quality assessment being needed to determine an

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ all major development to be at a minimum of neutral on its air quality effects. ● Policy should focus on ensuring development is in locations which reduce journey lengths and discourages private car use. 	<p>appropriate scheme of mitigation for relevant proposals.</p> <ul style="list-style-type: none"> ○ Such an approach not considered reasonable or feasible as could prevent development from coming forward which is essential for reasons of economic or wider social need. <ul style="list-style-type: none"> ● Addressed in Local Plan Publication Version Policy T1 ‘Development and transport policies’.

Retained policies

Table 126 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● DM14: The Health Impacts of Development – policy should be updated / amended to: <ul style="list-style-type: none"> ○ Recommend health considerations are incorporated into Design and Access Statements (or Environmental Statements) for larger developments rather than a Health Impact Assessment. ○ Make clear it covers both physical and mental health. 	<p>Local Plan Publication Version includes Policy HW2B ‘Health and development’.</p> <p>This seeks to ensure development contributes to reducing causes of ill health, improves health and reduces health inequalities by addressing adverse health impacts, providing a healthy living environment, promoting and enabling healthy lifestyles and providing good access to health facilities and services.</p> <p>Health Impact Assessments will be required to accompany large development proposals or where a significant impact on health and wellbeing is likely. These will identify any negative impacts and mitigation measures.</p> <p>Supporting text refers to policy relating to both physical and mental health.</p>

Health Impacts of Development

Draft Policy HW3: Takeaways

Table 127 - main issues raised on Draft Policy HW3: Takeaways and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Extend approach to: <ul style="list-style-type: none"> ○ off-licences; ○ betting shops; ○ fast food advertising close to schools. • Assumption that all Use Class A5 uses are harmful lacks evidence and fails to recognise their economic and centre viability benefits. • Lack of clarity on what constitutes 'young people' or 'youth facilities'. • Policy unjustified as fails to consider schools being closed for much of the year (i.e. weekends and school holidays). • Concern that application of the policy to mixed A3/A5 uses goes beyond NPPF intentions. • Clarification sought on whether policy would apply to leisure areas such as Avonmeads Retail Park. • Distance threshold in policy should be 800m. 	<ul style="list-style-type: none"> • Requests to extend approach: <ul style="list-style-type: none"> ○ Insufficient evidence concerning levels of harmful impact to justify policy. ○ Insufficient evidence concerning levels of harmful impact to justify policy. ○ The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 restrict local planning authority powers in respect of the control of advertisements to amenity and public safety matters only. • Policy does not pursue blanket ban of all A5 uses. Instead it allows an assessment to be made on whether a specific proposal is likely to have a harmful impact. • These are considered to be readily understood terms. • Approach considered reasonable and supported by national planning policy and guidance as well as local health-related objectives. • Reference to mixed A3/A5 uses considered important to ensure the assessment of any potential harmful impacts can be made for mixed-use proposals which include A5 uses. • Policy wording confirms that policy approach applies to out of centre locations. • Distance criteria approach maintained for Local Plan Publication Version Policy HW3 'Takeaways'. Supporting text to the policy identifies that there may be cases where a

Main issues raised	How they were addressed
	proposed takeaway located beyond 400m may not be acceptable due to other local factors which would result in the outlet being likely to have a harmful influence on children’s behaviour.

Utilities and Minerals

Retained policies

Table 128 - main issues raised on Retained policies and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> DM38: Minerals Safeguarding Areas: Conflict with proposal for new neighbourhood at Bath Road, Brislington (Policy DS12). Minerals Safeguarding Area should be deleted from proposals map as it relates to DS12 as extraction of coal is unlikely to be viable or desirable in planning and environmental terms. 	<ul style="list-style-type: none"> Approach in accordance with national planning policy.

Draft Development Allocations

Ashley

BDA0101 Land opposite 200-208 Mina Road

Table 129 - main issues raised on BDA0101 Land opposite 200-208 Mina Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Community-led development sought. No mention of garages. Concern about consequent impacts on parking. 	<ul style="list-style-type: none"> This site is no longer considered appropriate to be allocated due to recent planning permission for storage use on southern part of the site (ref. 22/00380/F) and unsuitability of northern section for housing due to flood risk.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concerns over car access to site. • Environment Agency thought no development should be allowed within 8 metres of Main River culvert. • Negative impact on rural character of area. • Concern about density of development proposed. 	

BDA0102 Land at 17-47 Lower Ashley Road

Table 130 - main issues raised on BDA0102 Land at 17-47 Lower Ashley Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency considered that site needs to be carefully considered with 'More Vulnerable' uses in Flood Zone 1 or located on upper floors. 	<ul style="list-style-type: none"> • Allocation no longer considered necessary as the site has planning permission for 31 units on western section (ref. 18/06646/F), and offices and student accommodation on the eastern section (ref. 18/05532/M and ref. 15/05530/P). The western section is under construction.

Avonmouth and Lawrence Weston

BDA0205 Land south of Gloucester Road

Table 131 - main issues raised on BDA0205 Land south of Gloucester Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency noted stated that the proposed allocation for 140 homes is located within the breach hazard bandwidth identified in the Strategic Flood Risk Assessment (SFRA) Level 2. 	<ul style="list-style-type: none"> • This site is no longer considered appropriate to be allocated due to unresolved flood risk issues. The site is within the limits defined by the Development Consent Order for the construction, operation and maintenance of the Hinkley Point C Connection Project.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Need to be consistent with the requirements of Draft Policy HW1 and Retained Policy DM35. • Respondents suggested this site would need to respect the heritage assets on Gloucester Road and Clayton Street. 	

BDA0206 Former Sea Mills Children Centre

Table 132 - main issues raised on BDA0206 Former Sea Mills Children Centre and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondents wanted to see a community-led development. • Respondent believed the development does not match density of the area. 	<ul style="list-style-type: none"> • Allocation no longer necessary as site has been developed.

BDA0207 Land adjacent to Custom House

Table 133 - main issues raised on BDA0207 Land adjacent to Custom House and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency stated that site should be screened against Avonmouth Severnside Enterprise Area flood risk model. • Need to be consistent with the requirements of Draft Policy HW1 and Retained Policy DM35. 	<ul style="list-style-type: none"> • This site is no longer considered appropriate to be allocated due to unresolved flood risk issues. The site is within the limits defined by the Development Consent Order for the construction, operation and maintenance of the Hinkley Point C Connection Project.

Bedminster

BDA0302 Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road

Table 134 - main issues raised on BDA0302 Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Sport England requested more clarity about the sport included in the mixed-use allocation. • The Environment Agency said there was an opportunity to deliver a net gain and environmental enhancements and improve the river flow under Winterstoke Road and prevent siltation of the Old Colliters Brook. 	<ul style="list-style-type: none"> • The site has planning permission for a sports and convention centre, a hotel, 125 homes, office accommodation, retail, gym, club museum, multi-storey car park (ref. 21/03165/F). Following discussion, the Environment Agency did not raise any objection to the application and a Biological Net Gain Assessment was provided which demonstrated that overall, the proposed landscape plan would deliver approximately 30% net gain for area-based habitats, 60% net gain for river units and a 90% net gain for hedgerow units.

BDA0303 Former Ashton Sidings

Table 135 - main issues raised on BDA0303 Former Ashton Sidings and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Comment suggested an amendment to reflect additional technical design and studies around Metro Bus services and the Ashton Gate Underpass. • Environment Agency stated that the Tidal and Fluvial flood zone in very close proximity to the site and therefore climate change will need to be included in the Sequential Test and flood risk management. • Respondent suggested an increase in density is required. 	<ul style="list-style-type: none"> • Allocation no longer considered necessary as the site has planning permission for residential apartments including affordable housing (social rented and shared ownership) and flexible retail/cafe space, and works have begun on site (ref. 20/01655/F).

BDA0304 1-25 Bedminster Down Road

Table 136 - main issues raised on BDA0304 1-25 Bedminster Down Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Sport England stated the Ju-Jitsu Dojo gym would need to be replaced in line with NPPF standards. • Respondents mentioned how the road design was dangerous to cyclists and pedestrians and this would need to be improved. 	<ul style="list-style-type: none"> • The redevelopment for housing led mixed-uses with flexible workspace if the site is no longer required in its current use, would represent a more efficient use of land in a mixed residential context in a sustainable location adjacent to bus routes and Parson Street Station. The allocation accords with the Local Plan’s aim of promoting urban living across the city with a focus on brownfield land, as outlined in Policy UL1 ‘Effective and efficient use of land’. • A development consideration requiring suitable access, which safeguards the operation of the adjacent junction and highway to ensure free-flow of public transport and general traffic, has been included.

BDA0306 Land at Marsh Lane / Winterstoke Road

Table 137 - main issues raised on BDA0306 Land at Marsh Lane / Winterstoke Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondents suggest that development should better incorporate cycling facilities in this area into the city network. 	<ul style="list-style-type: none"> • Allocation no longer considered to be necessary as any development proposals on the site can be progressed through the Development Management process.

Bishopston and Ashley Down

BDA0401 Land adjacent 321 Gloucester Road

Table 138 - main issues raised on BDA0401 Land adjacent 321 Gloucester Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • This site is no longer considered appropriate to be allocated due to recent planning

Main issues raised	How they were addressed
	permission for the erection of a new retail unit on a larger site (ref. 21/00202/F) and the subsequent clearance of the site.

Brislington East

BDA0601 Land at Latimer Close

Table 139 - main issues raised on BDA0601 Land at Latimer Close and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Respondent suggested without compensatory tree planting or open space provision development here would contradict the city's aim to increase tree canopy cover. 	<ul style="list-style-type: none"> A development consideration has been added requiring the retention and integration of important trees located within the site.

Brislington West

BDA0702 Land at Marmalade Lane (south)

Table 140 - main issues raised on BDA0702 Land at Marmalade Lane (south) and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Concern about loss of open space. Environment Agency raised concern that a small part south of the site is within Flood Zone 2 and requested that this be removed from the allocation 	<ul style="list-style-type: none"> The redevelopment of the site for homes would represent a more efficient use of underdeveloped land which is not required for open space purposes. The development consideration relating to flood risk has been revised to ensure development is sited appropriately within lower risk areas.

BDA0703 Land at Marmalade Lane (north)

Table 141 - main issues raised on BDA0703 Land at Marmalade Lane (north) and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondents wanted to see a community-led development. 	<ul style="list-style-type: none"> • Policy H5 ‘Self-build and community-led housing’ provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self-build/custom-build housing and/or community-led housing, and community-led exceptions sites.

Clifton Down

BDA1001 Land west of Hampton Lane

Table 142 - main issues raised on BDA1001 Land west of Hampton Lane and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern about loss of open space. • Concern about waste facilities. • Concern over student housing. • Respondents suggested large amounts of car parking and cycle parking on site. 	<ul style="list-style-type: none"> • Should plots become available or no longer be required in their current layout, redevelopment for homes would represent a more efficient use of land in a predominantly residential context. • Policy DC4 ‘Recycling and refuse provision in new development’ requires waste and recycling provision of specific capacity, design and access requirements to be provided as part of new residential developments. • Houses in multiple occupation and purpose built student housing will be subject to polices H7 ‘Managing the development of purpose-built student accommodation’ and H6 ‘Houses in multiple occupation and other shared housing’. • Policy T4A ‘Parking, servicing and the provision of infrastructure for electric vehicles’ requires appropriate levels of safe, secure, accessible and usable parking provision. It also explains the importance of cycle parking. This site is in a very accessible location, within Whiteladies Road Town

Main issues raised	How they were addressed
	Centre, and close to public transport (both bus routes on Whiteladies Road and Clifton Down Train Station).

BDA1002 Land at Whiteladies Gate

Table 143 - main issues raised on BDA1002 Land at Whiteladies Gate and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Site should be retained for commercial use. • Concern about loss of open space. • Concern over loss of existing green infrastructure. • Respondents suggested a maximum of 8-10 homes. 	<ul style="list-style-type: none"> • Development is allocated for housing, which may incorporate compatible workspace should the site no longer being required in its current use. Redevelopment for homes would represent a more efficient use of land in a predominantly residential context. • A development consideration has been included to ensure that development would not be harmful to trees on the boundaries of the site. • The estimated capacity for the site is 10 homes. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

BDA1003 Land Adjacent Alma Vale Road and Alma Court

Table 144 - main issues raised on BDA1003 Land Adjacent Alma Vale Road and Alma Court and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondent suggested the removal of the allocation for residential development and suggested the retention of car parking space. • Need to protect the Grade II listed building. • Concern over access to site. 	<ul style="list-style-type: none"> • The redevelopment of the site for homes would represent a more efficient use of land in a predominantly residential context. • The development consideration has been revised to emphasise the need to take account of the neighbouring Grade II listed buildings. • A development consideration requiring the provision of suitable access to the site from

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Concern over car parking. Should be allocated to 10 or fewer homes. 	<p>Alma Vale Road, with appropriate enhancements to footways is included.</p> <ul style="list-style-type: none"> Policy T4A 'Parking, servicing and the provision of infrastructure for electric vehicles' requires appropriate levels of safe, secure, accessible and usable parking provision. This site is in a very accessible location, adjacent to Whiteladies Road Town Centre, and close to public transport (both bus routes on Whiteladies Road and Clifton Down Train Station). The estimated capacity of 10 homes is based on achieving an efficient use of land within the context of the Whiteladies Road Conservation Area. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

BDA1004 Barley House, Oakfield Grove

Table 145 - main issues raised on BDA1004 Barley House, Oakfield Grove and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Comment suggested 20 homes was too many. 	<ul style="list-style-type: none"> The estimated capacity of 20 homes is based on achieving an efficient use of land within the context of the Grade II Listed Building. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

Cotham

BDA1101 Land at Gibson Road

Table 146 - main issues raised on BDA1101 Land at Gibson Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Respondent suggested the land was ideal for low density buildings. 	<ul style="list-style-type: none"> The site is considered suitable for residential development to support the existing pattern of residential developments fronting Gibson Road.

BDA1102 Land at Sydenham Lane

Table 147 - main issues raised on BDA1102 Land at Sydenham Lane and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Respondent suggested the land was ideal for low density buildings. 	<ul style="list-style-type: none"> The site is considered suitable for residential development to support the existing pattern of residential developments fronting Sydenham Lane.

Easton

BDA1201 16-20 Fishponds Road

Table 148 - main issues raised on BDA1201 16-20 Fishponds Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Respondents wanted to see a community-led development. 	<ul style="list-style-type: none"> Policy H5 'Self-build and community-led housing' provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self-build/custom-build housing and/or community-led housing, and community-led exceptions sites.

Eastville

BDA1301 Stapleton Cricket Club

Table 149 - main issues raised on BDA1301 Stapleton Cricket Club and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern over loss of green space and amenity space. • Concern over traffic. • Sport England stated that if the site is developed replacement facilities should be provided. • Respondent was concerned about a notable oak tree on the boundary, which was registered on the Ancient Tree Inventory. 	<ul style="list-style-type: none"> • Self-build custom housebuilding or community-led housing is considered appropriate subject to the provision of suitable alternative playing pitch for recreational purposes. • Traffic issues will be addressed by policy T3A 'Transport development management'. This will require a Transport Assessment to be submitted alongside a planning application where development is likely to have a significant traffic impact. This will enable the council to assess impacts of proposals and identify any necessary mitigation measures. • A development consideration requiring the retention of green infrastructure including an important oak tree and boundary hedgerows has been added.

BDA1302 Land south of Rose Green Close

Table 150 - main issues raised on BDA1302 Land south of Rose Green Close and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Issue of lack of infrastructure. • Sport England recommended the site is protected for its amenity value and is therefore deleted from the allocations. 	<ul style="list-style-type: none"> • Future development in Bristol will be supported by new and improved infrastructure such as schools, parks, transport facilities and health facilities in accordance with Policy IDC1 'Development contributions and CIL'. New development will be expected to contribute to these requirements generally through Community Infrastructure Levy or via planning obligations in cases where site specific infrastructure requirements arise. • Should the site no longer be required in its current use redevelopment for homes would represent a more efficient use of land in a residential context.

Filwood

BDA1401 Land at Hartcliffe Way

Table 151 - main issues raised on BDA1401 Land at Hartcliffe Way and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency stated that the site in close proximity to the Main River Malago and 8 metre maintenance access will be required. • Need for public transport provisions. • Need for a mixed use development. 	<ul style="list-style-type: none"> • A development consideration requiring the maintenance of an 8m buffer adjacent to the main river to ensure maintenance access to the waterway has been added. • The site is located on a route identified for public transport improvements in Policy T2 'Transport infrastructure improvements'. It is in a relatively sustainable location on a bus route along Hartcliffe Way and close to Parson Street Train Station. • The site is relatively close to shops and services and redevelopment for residential mixed-use with workspaces would represent a more efficient use of land in a mixed residential and industrial context.

BDA1402 Land at Nover's Hill

Table 152 - main issues raised on BDA1402 Land at Nover's Hill and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency stated that the site is in close proximity to the Main River Malago and 8 metre maintenance access will be required. 	<ul style="list-style-type: none"> • A development consideration requiring the maintenance of an 8m buffer adjacent to the main river to ensure maintenance access to the waterway has been added.

BDA1403 Land at Bedminster Road/Highbury Road

Table 153 - main issues raised on BDA1403 Land at Bedminster Road/Highbury Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency stated that a small part of the site 	<ul style="list-style-type: none"> • Allocation no longer necessary as site has been developed.

Main issues raised	How they were addressed
is within Flood Zone 2 and requested this be removed from the allocation.	

Frome Vale

BDA1501 Land at College Road Fishponds

Table 154 - main issues raised on BDA1501 Land at College Road Fishponds and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern over the loss of green space. • Concern over horse that lives on site considered very important to local community. 	<ul style="list-style-type: none"> • The development strategy has a focus on ensuring the delivery of new homes. The site is included in Policy H5 'Self-build and community-led housing' as it is considered appropriate for self-build, custom or community-led housing and would support its delivery, contributing to greater housing choice and potentially providing lower cost options for households than regular market housing. • The site has a residential context and is in a sustainable location close to shops and services in Fishponds Town Centre and open space at Oldbury Court Estate.

Hengrove and Whitchurch Park

BDA1801 Hengrove Leisure Park

Table 155 - main issues raised on BDA1801 Hengrove Leisure Park and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Request that policy should explicitly state that any development would be guided by the Neighbourhood Plan. • Need to maintain links to Hengrove Park. 	<ul style="list-style-type: none"> • Allocation no longer considered necessary as the site has planning permission for residential-led mixed-use development comprising up to 350 homes and up to 1,650sqm of flexible Class E uses (ref. 21/00531/P).

BDA1802 Land at Western Drive

Table 156 - main issues raised on BDA1802 Land at Western Drive and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern over loss of wildlife network. • Woodland on the site should be maintained and connected to other nearby woodland. 	<ul style="list-style-type: none"> • This site is no longer considered appropriate to be allocated as it is no longer available for industrial / distribution uses.

Knowle

BDA2201 Broadwalk Shopping Centre

Table 157 - main issues raised on BDA2201 Broadwalk Shopping Centre and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • Allocation no longer considered necessary as the site has planning permission (refs. 18/05184/P and 22/03924/P)

Lockleaze

BDA2401 Bridge Farm, Land at South Hayes

Table 158 - main issues raised on BDA2401 Bridge Farm, Land at South Hayes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern over loss of open space. • Comment suggested that the site should provide 50 100% affordable homes. 	<ul style="list-style-type: none"> • The allocation includes open space and the capacity has been reduced to an estimated 15 homes to enable the majority of the open space on the site to be retained. It is considered that with sensitive design, this will enable a type and design of development which preserves and enhances the Stapleton and Frome Valley Conservation Area and facilitates the sensitive preservation and enhancement of the Grade II Listed Bridge Farm. • Policy H5 'Self-build and community-led housing' specifically allocates this site for

Main issues raised	How they were addressed
	self-build and custom housebuilding and/or community-led housebuilding. The policy states that such sites should, where viable, be delivered primarily as affordable housing.

BDA2402 Land to the east of Romney Avenue and Stanfield Close

Table 159 - main issues raised on BDA2402 Land to the east of Romney Avenue and Stanfield Close and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondents wanted to see a community-led development. 	<ul style="list-style-type: none"> • Allocation no longer considered necessary as the site has planning permission for 12 homes and development is under construction (ref. 22/01638/FB).

BDA2403 Former Gas Holder Site, Glenfrome Road

Table 160 - main issues raised on BDA2403 Former Gas Holder Site, Glenfrome Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondents wanted to see a community-led development. 	<ul style="list-style-type: none"> • Allocation no longer necessary as the site has been developed as a new office/light Industrial unit, and storage/distribution use (ref. 19/04802/F).

Redland

BDA2501 Land south of Zetland Road

Table 161 - main issues raised on BDA2501 Land south of Zetland Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Request for additional small workshop spaces or a convenient health care facility location is provided. 	<ul style="list-style-type: none"> • The allocation makes provision for housing compatible workspace. The redevelopment of the site for homes with workspace would represent a more efficient use of land in a predominantly residential context.

BDA2502 Land at Cossins Road

Table 162 - main issues raised on BDA2502 Land at Cossins Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondents wanted to see a community-led development. 	<ul style="list-style-type: none"> • Policy H5 ‘Self-build and community-led housing’ provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self-build/custom-build housing and/or community-led housing, and community-led exceptions sites.

St George Trooper’s Hill

BDA2701 Land at Crew’s Hole Road

Table 163 - main issues raised on BDA2701 Land at Crew’s Hole Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Environment Agency object to the development in this location. The site is located in present day Fluvial and Tidal Flood Zone 3 and with climate change, flood levels and depths would increase further. 	<ul style="list-style-type: none"> • This site is no longer considered appropriate to be allocated due to unresolved flood risk and highways issues.

St George West

BDA2801 Land to the south of Blackswarth Road

Table 164 - main issues raised on BDA2801 Land to the south of Blackswarth Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Need to retain the character of the Avon Valley Conservation Area. • Concern over lack of public transport. • Environment Agency stated that this site relates to Future Flood Zone 3 and is 	<ul style="list-style-type: none"> • There is a development consideration included which requires development to take account of the Avon Valley Conservation Area and retain a green frontage with the River Avon. Furthermore, Policy CHE1 ‘Conservation and the historic environment’ states that development within or which would affect the setting of a conservation area will be expected to

Main issues raised	How they were addressed
<p>in proximity to the Main River Avon. An 8-metre set back distance would be required from the brink of the bank.</p>	<p>preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.</p> <ul style="list-style-type: none"> • The site is in close proximity to St Annes Village Local Centre and bus services on Blackswarth Road. • The development consideration relating to flood risk has been revised to stress that the drainage strategy should cover the lifetime of the development and ensure no increased flood risk to third parties. • A development consideration requiring the maintenance of an 8m buffer adjacent to the main river to ensure maintenance access to the waterway has been added.

Southmead

BDA2901 Land at Lanercost Road

Table 165 - main issues raised on BDA2901 Land at Lanercost Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Respondents wanted to see a community-led development. • Concern over loss of open space. 	<ul style="list-style-type: none"> • Policy H5 'Self-build and community-led housing' provides several mechanisms for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self-build/custom-build housing and/or community-led housing, and community-led exceptions sites. • The redevelopment of the site for homes would represent a more efficient use of land in a predominantly residential context. The land is not required for open space purposes and is in close proximity to Elderberry Walk Open Space to the north.

Southville

BDA3001 Land at North Street / Durnford Street

Table 166 - main issues raised on BDA3001 Land at North Street / Durnford Street and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • Allocation no longer considered necessary as there are several planning permissions on parts of the site — including mixed-use development of 107 homes, office workspace and flexible commercial space which is under construction (ref. 18/04367/F); 7 flats (ref. 23/00592/X); and 40 homes and commercial floorspace (ref. 20/04125/F) — which demonstrate that the site is coming forward.

Stockwood

BDA3101 Greville building, Lacey Road

Table 167 - main issues raised on BDA3101 Greville building, Lacey Road and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of access. • Concern over allocation of social housing. • Concern over parking. • 32 homes considered too many. 	<ul style="list-style-type: none"> • The site has planning permission for 26 residential units (ref. 21/05859/FB). • Issues over access have been resolved through the Development Management process. • Parking has been shown to meet the maximum standards of the adopted Bristol Local Plan. • Policy AH1 'Affordable housing provision' provides a range of delivery mechanisms to deliver affordable housing. Bristol City Council is committed to building a better Bristol where all citizens are able to access a safe, permanent and genuinely affordable place to live. The need for affordable housing in Bristol is very high and critical to the long-term social, economic and environmental health of the city.

Main issues raised	How they were addressed
	<ul style="list-style-type: none"> The redevelopment of the site for homes would represent a more efficient use of land in a predominantly residential context. The estimated capacity has been reduced to 25 homes to reflect the planning permission on the site. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

Stoke Bishop

BDA3201 Land at Sanctuary Gardens, Sneyd Park

Table 168 - main issues raised on BDA3201 Land at Sanctuary Gardens, Sneyd Park and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Respondents wanted to see a community-led development. 20 homes seen to be too many. 	<ul style="list-style-type: none"> Policy H5 'Self-build and community-led housing' provides several means for delivering community-led housing including specific allocations, provision for a minimum of such development on allocations within the green belt, seeking a proportion of growth and regeneration areas as self-build/custom-build housing and/or community-led housing, and community-led exceptions sites. The estimated capacity of 20 homes reflects the context within the Sneyd Park Conservation Area. In accordance with policy DA1 'Proposed development allocations', if the capacity indicated is not possible due to site considerations, a lower number of homes than the one stated would be appropriate.

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further consultation (2022)

In November 2022 the council published the ‘Bristol Local Plan Review – Draft Policies and Development Allocations – Further consultation’ document for comment. A total of 449 responses were received.

The main issues raised and how they were addressed in the Local Plan are set out in the tables below.

Vision: Building a better Bristol

Vision

Table 169 - main issues raised on Vision and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Needs to be strengthened in relation to: climate change; transport; health and well-being; communities; and education. • Specific reference needed to: delivering housing to support life-long living; prioritising use of derelict buildings, rather than building on greenfield land; prioritising good design and protection of city's heritage; provision of open space and public realm; promoting delivery of high-quality infrastructure; promoting employment and higher wages; and promoting a healthy living environment. • Objection to number of new homes proposed to be built as considered to be an underestimation. 	<p>The Local Plan Publication Version contains a positive vision for the future development of Bristol looking ahead to 2050.</p> <p>It addresses as succinctly as possible the key issues and needs facing the city, charting the expected progress on how they will be met.</p> <p>The vision is supported by a set of aims and objectives. These provide more detail on how the Local Plan will address the issues identified in the vision. References are provided to chapters in the Local Plan which contain policies with a particular focus on responding to the aims and objectives.</p> <p>The key matters raised in the 2018, 2019 and 2022 consultations have informed the vision, objectives, aims and / or policies of the Local Plan Publication Version.</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Failure of housing numbers in Vision to align with those in Objectives section. • More explanation needed on meaning of ‘development of rapid transit systems’. Focus should be on improvements to, and extensions of, existing sustainable and active transport networks. • Clarity needed on meaning of ‘urban living’. • Historic England thought reference should be made to importance and relationship of historic environment in relation to the city’s net zero commitment, its prosperity, place shaping, civic pride and well-being. • Bath and North East Somerset Council thought vision should reflect potential requirement for new homes to be met outside city’s boundary. • South Gloucestershire Council identified no specific mention in Vision to importance of ecology or biodiversity. 	

Objectives

Table 170 - main issues raised on Objectives and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern that objective of meeting development needs is prioritised ahead of addressing climate and ecological emergencies. • Greater emphasis needed on: <ul style="list-style-type: none"> ○ growth of education sector. ○ How housing targets will be achieved, i.e. brownfield and / or greenfield development. ○ Parks and green spaces. ○ Economy and jobs. ○ Healthy environment. 	<ul style="list-style-type: none"> • Objectives will be pursued mutually. All policies in the Local Plan relevant to a proposal will be used in deciding planning applications. • Requests for greater emphasis: <ul style="list-style-type: none"> ○ Not considered appropriate to include as a key objective. In relation to higher education providers, the spatial implications of their growth are addressed in the Local Plan Publication Version. For example, one of the plan’s aims refers to managing the development of student housing to safeguard existing communities whilst supporting thriving universities by meeting student accommodation needs. In addition, Policy DS1 ‘Bristol City Centre’ promotes the continued consolidation and expansion on the University of Bristol’s city centre campus site. ○ Addressed in the section on the plan’s aims. This refers to a focus on brownfield land. ○ Addressed in section on plan’s aims which refers to protecting valued open spaces. ○ Addressed in section on plan’s aims. This refers to enabling the sustainable growth of the economy. ○ Addressed in section on plan’s aims. This refers to the aim of achieving healthy neighbourhoods which achieve a liveable environment.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Historic England sought an objective relating to the historic environment. • Natural England suggested a target for greenspace provision and improving access to greenspace is included. 	<ul style="list-style-type: none"> • A new aim has been added to the Local Plan Publication Version which refers to cherishing the city’s historic environment and harnessing the benefits of heritage-sensitive regeneration. • Targets for green infrastructure provision are included in the Local Plan Publication Version Policy BG1 ‘Green Infrastructure and biodiversity’. These relate to Natural England’s Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023.

Aims

Table 171 - main issues raised on Aims and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Housing development given too much weight. Health and wellbeing and the environment should be prioritised. • Concern that brownfield development focus will mean that housing requirements unlikely to be met, taking into account heritage asset constraints and competing demands for employment land and green space provision. • Concern that ‘urban living’ aim will have adverse implications for suburban character and retention of employment land, plus needs better definition. • Reference to open spaces should include aim to enhance as well as protect. 	<ul style="list-style-type: none"> • Aims will be pursued mutually. All policies in the Local Plan relevant to a proposal will be used in deciding planning applications. • Brownfield development focus considered appropriate and supported by the NPPF. Some areas of the existing Green Belt at Brislington, Bishopsworth and Ashton Vale are also proposed to be released to enable new homes to be delivered to meet the needs of the city. • Urban living seeks to balance making the most efficient use of urban land with achieving successful placemaking and liveability. • Reference to development enhancing the city’s green and blue infrastructure is contained within Local Plan Publication

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Reference to managing development of student accommodation to safeguard existing communities should be framed in relation to potential for harmful impacts. • Concern that aims difficult to achieve if city's employment and economic needs not sufficiently addressed. • Historic England sought inclusion of historic environment aim. • Natural England thought an aim should be for the plan to protect brownfield sites with high value for biodiversity. 	<p>Version Policy BG1 'Green Infrastructure and biodiversity in new development'.</p> <ul style="list-style-type: none"> • Reference to potential harmful impacts is considered more appropriately included within the relevant policy. For the Local Plan Publication Version this is Policy H7 'Managing the development of purpose-built student accommodation.' • Aims will be pursued mutually. The strategy for meeting the city's employment and economic development needs is set out in Local Plan Publication Version Policy E2 'Economic development land strategy'. • A new aim has been added to the Local Plan Publication Version which refers to cherishing the city's historic environment and harnessing the benefits of heritage-sensitive regeneration. • The protection of brownfield land with biodiversity value is considered more appropriately included within the relevant policy. For the Local Plan Publication Version this is Policy BG2 'Nature Conservation and Recovery'.

Housing need and requirement

Draft Policy H1: Delivery of new homes – Bristol's housing requirement

Table 172 - main issues raised on Draft Policy H1: Delivery of new homes – Bristol's housing requirement and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More detail needed on how neighbouring authorities have been engaged on meeting housing need outside city's boundaries. • Objection to proposal that neighbouring councils should 	<ul style="list-style-type: none"> • Suitable engagement has taken place in the preparation of the Local Plan Publication Version and will continue under the duty to co-operate. • Approach considered appropriate for reasons set out in 2022 document's section

Main issues raised	How they were addressed
<p>accommodate Bristol's shortfall in meeting its housing need.</p> <ul style="list-style-type: none"> • Concerns about infrastructure and environmental impacts resulting from accommodating housing requirement. • Insufficient reference to meeting needs of specific groups, such as students and older people. • Should specify a target for amount of affordable homes to be delivered by 2040. • Concern housing target too high: <ul style="list-style-type: none"> ○ Contrary to tackling climate change objective; ○ Lack of evidence it will reduce property prices; ○ Will lead to high density development not in character with Bristol. • Concern housing target too low: <ul style="list-style-type: none"> ○ Does not reflect assessed need; ○ Lack of evidence to support housing figure, e.g. published 	<p>entitled 'Bristol's capacity to deliver homes'.</p> <ul style="list-style-type: none"> • Adequate infrastructure to support new development addressed by Local Plan Publication Version Policy IDC1 'Development contributions and CIL'. Environmental impacts covered by various policies in the Publication Version's Green Infrastructure and Biodiversity, Net Zero and Carbon Health chapters, amongst others. • Addressed in other Local Plan Publication Version policies including H4 'Housing type and mix', H7 'Managing the development of purpose-built student accommodation' and Policy H8 'Older people's and other specialised needs housing'. • Target added to Local Plan Publication Version Policy AH1 'Affordable housing provision'. • Housing target in draft policy considered appropriate for reasons set out in the consultation document. Approach maintained for Local Plan Publication Version H1 'Delivery of new homes – Bristol's housing requirement'. • Housing target in draft policy considered appropriate for reasons set out in the consultation document. Approach maintained for Local Plan Publication Version H1 'Delivery of new homes – Bristol's housing requirement'.

Main issues raised	How they were addressed
<p>urban capacity assessment;</p> <ul style="list-style-type: none"> ○ Should be higher to deliver more affordable homes and improve housing affordability; ○ Brownfield land focus unlikely to be viable given recent lower delivery rates on these sites. <ul style="list-style-type: none"> ● Bath and North East Somerset Council sought reassurance that, for the Publication Stage, evidence will demonstrate that BCC is maximising its urban capacity and that the assumed capacity for Bristol will be deliverable and viable. <p>As there would be likely displacement of industrial and other employment uses from areas of growth and regeneration, they questioned whether adequate provision had been made within Bristol for displaced uses, as well as to meet newly arising employment demand over the plan period.</p> <ul style="list-style-type: none"> ● North Somerset Council thought it important that BCC fully explores opportunities to meet its own housing need before considering ability of North Somerset to accommodate any residual need given its 	<ul style="list-style-type: none"> ● Local Plan Publication Version H1 ‘Delivery of new homes – Bristol’s housing requirement’ is supported by appropriate published evidence. Publication Version Policy E2 ‘Economic development land strategy’ sets out the scale and location of new workspace expected to be provided over the plan period to meet identified needs. ● This has been carried out, with the approach explained and supported by policies in the Local Plan Publication Version’s ‘Development Strategy’ and ‘Urban Living’ chapters, amongst others.

Main issues raised	How they were addressed
<p>own challenging housing target.</p> <ul style="list-style-type: none"> • Historic England raised concern at reference to existing allocations accommodating more homes. As likely to result in higher densities and increase potential for taller buildings, approach should be caveated to prevent inappropriate forms of development. • Environment Agency sought reference to flood risk as a constraint to meeting housing need. • Appendix 1 Bristol’s housing need and requirement: <ul style="list-style-type: none"> ○ Homes England concerned at lack of evidence provided on suitability, deliverability and developability of Table 2 sites. ○ North Somerset Council sought reassurance that, at the Publication Stage, an updated housing delivery trajectory will be presented to support the urban capacity figure proposed. • Housing Needs Paper: <ul style="list-style-type: none"> ○ Fails to sufficiently set out exceptional circumstances for departing from 	<ul style="list-style-type: none"> • This reference has been maintained for the Local Plan Publication Version. It is considered suitable as complements the plan’s Urban Living aim and policies. These seek to balance the efficient and effective use of land with aspirations for making quality places to live, successful placemaking, and a positive response to context. • Not considered necessary to make specific reference to this issue. • Appendix 1 Bristol’s housing need and requirement: <ul style="list-style-type: none"> ○ Local Plan will be supported by a strategic housing land availability assessment. • Housing Needs Paper: <ul style="list-style-type: none"> ○ The Local Housing Needs Assessment for Bristol is being progressed based on the Government's standard method figure, informed by the November 2022

Main issues raised	How they were addressed
<p>Government’s standard method.</p> <ul style="list-style-type: none"> ○ Concern that references to student housing need are based on assumptions rather than evidence from city’s further education providers. ○ Does not adequately deal with: <ul style="list-style-type: none"> ▪ relationship between city and surrounding administrative areas. ▪ affordability issues. ▪ housing needs of older people and students. 	<p>housing needs paper.</p> <ul style="list-style-type: none"> ○ Approach in Publication Version policies H1 ‘Delivery of new homes – Bristol’s housing requirement’ and H7 ‘Managing the development of purpose-built student accommodation’ supported by appropriate evidence. ○ Issues addressed in Local Plan Publication Version ‘Development Strategy’ policies as well as Policy H1 ‘Delivery of new homes – Bristol’s housing requirement’, Policy AH1 ‘Affordable housing provision’, Policy H8 ‘Older people’s and other specialised needs housing’ and Policy H7 ‘Managing the development of purpose-built student accommodation’. Policies also supported by appropriate evidence, including Local Housing Needs Assessment.

Affordable housing

Draft Policy AH1: Affordable housing provision

Table 173 - main issues raised on Draft Policy AH1: Affordable housing provision and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy needs to be viability tested as may affect viability of development given other competing policy requirements. • Clearer definitions needed for social rent and affordable rent. 	<ul style="list-style-type: none"> • Local Plan Publication Version supported by viability assessment. • Detailed definitions provided in the council’s Affordable Housing Practice Note, referred to in explanatory text to draft policy.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy appears to provide flexibility to allow affordable homes for sale to be delivered as solely shared ownership units with no requirement for First Homes. Query whether this complies with government guidance. • Affordable housing tenure proportion for general housing: <ul style="list-style-type: none"> ○ Objection to proposed reduction in tenure split percentage compared with adopted Local Plan. ○ Flexibility needed to allow split to be negotiated. ○ South West Housing Association Planning Consortium objected to affordable homes for rent not being included in the tenure split. • Affordable housing tenure proportion for build to rent schemes in stand-alone blocks: <ul style="list-style-type: none"> ○ Objection to requirement for as 	<ul style="list-style-type: none"> • The draft policy explained that the council will accept affordable housing offers comprising First Homes or Shared Ownership units. Whilst Shared Ownership is the council’s preferred route to Affordable Home Ownership this would not preclude consideration of proposals for First Homes, delivered in accordance with the proportion set out in the Written Ministerial Statement and Planning Practice Guidance, where a developer wishes to provide them. This approach has been maintained in Local Plan Publication Version AH1 ‘Affordable housing provision’. • Proposed tenure mix in draft policy considered appropriate reflecting latest assessment of priority affordable housing need and national expectation to deliver affordable home ownership. Policy has been amended to allow flexibility in tenure requirements where required to increase affordable housing delivery. Approach maintained in Publication Version Policy AH1. • Approach not contrary to planning practice guidance and maintained in Publication Version Policy BTR1 ‘Build to Rent housing’.

Main issues raised	How they were addressed
<p>75% social rent and 25% shared ownership provision as contrary to national planning policy and guidance.</p> <ul style="list-style-type: none"> • General provisions of policy: <ul style="list-style-type: none"> ○ Objection to requirement for affordable housing to be transferred only to BCC’s registered providers. ○ Reference to ‘locally affordable price’ is unclear on what the price is and how it would be implemented. ○ Concern that policy does not provide sufficient flexibility to allow public subsidy where schemes are delivered as 100% affordable housing. 	<ul style="list-style-type: none"> • General provisions of policy: <ul style="list-style-type: none"> ○ The approach allows for affordable housing to be transferred to other affordable housing partners. Approach maintained in Publication Version Policy AH1. ○ Explanatory text to draft policy provides more information on locally affordable price. This is supported by additional detail in the Affordable Housing Practice Note, referenced in the policy. Draft policy approach maintained in Publication Version Policy AH1. ○ Draft policy has been amended to identify where public subsidy could be sought. Draft policy also makes reference to the Affordable Housing Practice Note providing guidance on policy implementation. Practice Note makes clear that where a development is being brought forward for 100% affordable housing by a Registered Provider the use of public subsidy will be supported for all units. Draft policy approach maintained in Publication Version Policy AH1.

Net zero and climate

Table 174 - main issues raised on Net zero and climate and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> The policies should be accompanied by evidence and viability testing. 	<ul style="list-style-type: none"> These policies reflect an up-to-date and extensive evidence base, including works commissioned by the council directly.

Draft Policy NZC1: Climate change, sustainable design and construction

Table 175 - main issues raised on Draft Policy NZC1: Climate change, sustainable design and construction and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Policy should require development to go beyond net zero to net negative. Policy should require buildings to be adaptable to future technologies. Policy is overly onerous and too drastic a change from current policy which could impact the deliverability of affordable housing or high quality design. Policy should set out an approach to retrofitting existing buildings. The policy should include mention of active travel and public transport. 	<ul style="list-style-type: none"> The requirements in this suite of policies are robust and are a path towards net zero carbon development. Requiring development to go beyond mitigating its own impact and being designed to be adapted and resilient to the impacts of climate change is not considered proportionate or sound planning policy and could unduly impact viability. The policy now includes a reference to the need to adapt to use future technologies. Policy NZC2 includes requirements new relating to system flexibility also. The policy is considered a proportionate balance between the need to address the climate emergency and the need for development. The current local plan policies were prepared over a decade ago and are in need of updating. These policies represent best practice that is recommended by national organisations and their requirements are key to achieving high quality design. The plan includes a clearer and more supportive stance on retrofitting existing buildings, both in the chapter introduction and Policy NZC5. Promoting active travel and use of public transport in development design is now included. This is also addressed by the plan's transport policies.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • The requirement for BREEAM Communities is overly onerous. • The requirement for BREEAM Communities Assessment should be for proposals for significantly more than 100 units. • BCC must provide evidence and justification if they wish to set standards higher than building regulations. • PassivHaus certification should be a requirement of the draft policy, instead of being encouraged by the policy. • The water efficiency standard is overly onerous and must be supported by evidence. • Policy should be strengthened with regard to flood risk mitigation. 	<ul style="list-style-type: none"> • The requirement for BREEAM Communities is already in the Core Strategy. • The threshold for BREEAM Communities has been increased to over 200 dwellings to better reflect its criteria and purpose. • The requirement for these policies is clearly evidenced and justified through the council's evidence base. • PassivHaus is provided as an alternative route to compliance. By providing an existing, high quality certification scheme, the policy provides a streamlined approach for developers that retains a high level of environmental sustainability. • Local authorities are permitted to require new developments to meet the tighter Building Regulations optional requirement of 110 litres/person/day where need is evidenced. Bristol Water's Final Water Resources Management Plan 2019 sets out a commitment to achieve this standard and the local plan supports this. • Flood risk mitigation is addressed through Local Plan Publication Version policies FR1-2 and in part NZC4.

Draft Policy NZC2: Net zero carbon development – operational carbon

Table 176 - main issues raised on Draft Policy NZC2: Net zero carbon development – operational carbon and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • The level of detail in the policy is too great and should be expanded on in an SPD. 	<ul style="list-style-type: none"> • A practice note will be prepared to accompany this policy and provide further guidance on compliance.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • The policy should provide more detail as to how to maximise renewable energy should be maximised in new schemes. • The requirements of the policy are overly onerous and will impact delivery of new development. • Further clarity is needed in relation to whether net zero is expected to be demonstrated at developments by measuring energy use intensity rather than carbon emissions. • The principle of allowing offsetting where energy requirements cannot be met on-site should be removed. Developers may use this as an excuse to not meet EUI targets. • More explicit guidance as to how offsetting criteria will be met is needed. 	<ul style="list-style-type: none"> • The council’s future design guidance and practice note will address renewables in new development and provide guidance on maximising generation on site. • Similar policy approaches NZC2 are already in use in other authorities in England and represents best practice. • The policy has been amended to make it clear that energy use intensity rather than carbon emissions is the metric used to assess compliance with the policy. • The policy recognises that in some instances it will not be feasible to meet the renewable energy generation requirements on site. The council will expect thorough evidencing of why these targets cannot be met before permitting offsetting. The council’s position is that the EUI targets are achievable and should be met in most development. • The council will publish further guidance to accompany the local plan that will detail the implementation of the policy suite.

Draft Policy NZC3: Embodied carbon, materials and waste

Table 177 - main issues raised on Draft Policy NZC3: Embodied carbon, materials and waste and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • The requirements of the policy are overly onerous and will impact delivery of new development. • The policy should prioritise the reuse/repurposing of 	<ul style="list-style-type: none"> • The policy is considered a proportionate balance between the need to address the climate emergency and the need for development. • The policy prioritises the renovation or retrofit of existing structures where

Main issues raised	How they were addressed
<p>existing buildings.</p> <ul style="list-style-type: none"> • There should not be a differing approach for buildings of varying heights. The lesser requirements for taller buildings are not reflective of the higher level of embodied carbon generally in taller buildings. • The policy requirements relating to demolitions, waste and recycling are too imprecise and unclear for development management purposes. • Specific reference should be made to circular economy principles. 	<p>appropriate subject to other considerations in the local plan.</p> <ul style="list-style-type: none"> • The difference in approach for development of 5 storeys or more is because: <ul style="list-style-type: none"> ○ At this scale, all developments are expected to be multi-dwelling apartments rather than houses, representing a different building type. ○ Two criteria for higher risk buildings in the Building Safety Act are if they contain 2 or more dwellings and/or they are above 18m or 7 storeys tall. Buildings above this threshold face stricter fire safety requirements and are currently unlikely to be able to use timber construction to reduced embodied carbon. • The expected approach to reporting on demolitions, waste and recycling has been made clearer. • The policy now embeds circular economy principles as key to meeting the requirements of the policy.

Draft Policy NZC4: Adaptation to a changing climate

Table 178 - main issues raised on Draft Policy NZC4: Adaptation to a changing climate and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • The policy is overly focused on overheating and flooding. The policy should be extended to refer to things like extreme weather events. 	<ul style="list-style-type: none"> • This policy has been redrafted in response to the November 2022 consultation. This has been done to make the policy more legible and reflective of comments raised. The policy now emphasises the importance of assessing context to inform design when considering climate adaptation.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • The policy should make greater reference to the use of green/blue infrastructure in adapting to a changing climate. • The policy is too risk focused and not sufficiently strategic in scope. • The use of TM59 analysis methodology should be included in the policy. • Links between the adaptation strategy and flood risk assessment should be made explicit. 	<p>The policy recognises a wider range of climate change associated risks including extreme weather events.</p> <ul style="list-style-type: none"> • The policy makes more explicit reference to the role multifunctional green and blue infrastructure can play in adapting development to climate change. • The policy requires development to be designed in a way that is informed by its context. This includes identifying local needs and opportunities and whether development is in a location that could exacerbate climate change risks in the surrounding area or elsewhere in the city. The policy also highlights how green/blue infrastructure and other climate adaptation measures can have impacts beyond their immediate location and that this will be viewed favourably by the council in planning decisions. • The use of TM59 analysis methodology is now included in the policy’s explanatory text. • The policy requires a summary of the approach to flood risk and drainage to be included in the adaptation strategy as well as a separate Flood Risk Assessment.

Draft Policy NZC5: Renewable energy development

Table 179 - main issues raised on Draft Policy NZC5: Renewable energy development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Need for policy to protect existing renewable energy generation installations. 	<ul style="list-style-type: none"> • The policy specifically concerns the provision of new renewable energy generating capacity. It has also since been amended to be supportive of energy-efficiency retrofit and small scale renewables in existing buildings. The policy supports the repowering of existing infrastructure also

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Stronger policy needed to support renewable energy development, e.g. make reference to support for solar panels and offshore wind. • Need for a strategic approach to provision of renewable energy installations in order to avoid piecemeal proposals and overconcentration in an area. • Natural England thought the council should explore the most suitable and deliverable options for renewables in different parts of the plan area, having regard to ecology impacts. They also considered that commercial development could be encouraged to use solar panels for energy generation, or green roofs to reduce demand for air conditioning. • South Gloucestershire Council notes the plan’s approach to focus renewable energy capacity within Avonmouth and Bristol Port area. As this approach could have direct implications for South Gloucestershire continued dialogue is requested. 	<p>where this would require planning permission.</p> <ul style="list-style-type: none"> • The policy has been strengthened to make clear that renewable energy generation is supported across the city, including at the individual building level. • The policy provides a supportive framework for development of renewable energy across the city. Avonmouth is considered to be an area of particular suitability for these uses and so higher concentrations will be expected in this area. All proposals will be subject to the other policies in the plan when assessed to avoid issues such as this. The plan’s focus on Avonmouth is informed by work such as the City Wide Energy Study and the fact that the area already hosts significant renewable energy generation assets. • The council is committed to continuing dialogue with its neighbouring authorities and recognises South Gloucestershire’s position as a stakeholder regarding renewable energy generation in the Avonmouth and Bristol Port area.

Biodiversity and nature recovery

Draft Policy BG1: Green Infrastructure and biodiversity in new development

Table 180 - main issues raised on Draft Policy BG1: Green Infrastructure and biodiversity in new development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Objection to assumption in introductory text that brownfield sites have less biodiversity value than greenfield sites. • Clarify role of West of England Joint Green Infrastructure Strategy 2020-2030 and Nature Recovery Network in relation to Local Plan. • Policy wording lacks precision about requirements expected from proposals. • Policy onerous with potential negative impacts on housing delivery. • Strengthen policy with additional references to / emphasis on: nature-based flood management, sustainable drainage, tree planting, food growing, health and wellbeing, mitigating the urban heat island effect, air quality, active travel, ecological and climate change emergency declaration, incorporating green infrastructure into all new development, replacing 'expected' and 	<ul style="list-style-type: none"> • Introductory text revised for Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity in new development'. • Publication Version Policy BG1 amended. Reference is now made to ensuring the integrity and connectivity of the Nature Recovery Network and wider network of green and blue infrastructure across the city will be maintained, protected, enhanced and restored. This reflects priorities set out in the West of England Joint Green Infrastructure Strategy. • Policy considered to be sufficiently clear with specific examples provided in policy text. • Approach considered appropriate for reasons set out in introductory text. • References were made in the draft policy to most of the points raised. Many are also covered by other policies in the Local Plan Publication Version. The draft policy provisions are considered reasonable and proportionate and have been maintained for Publication Version Policy BG1.

Main issues raised	How they were addressed
<p>other types of conditional language with ‘must’, protecting and enhancing hedgerows and urban hedges.</p> <ul style="list-style-type: none"> • Natural England’s Green Infrastructure Framework should be referenced. • Policy does not allow for mitigation where it is not possible or desirable to maintain existing green infrastructure features. • Clarity sought on the reference to appropriate standards for ensuring major development proposals meet the policy’s provisions. • Natural England considered that: <ul style="list-style-type: none"> ○ Scope of draft policy should be expanded to incorporate strategic aims of plan relating to nature and green infrastructure. ○ Policy provisions were unclear as to 	<ul style="list-style-type: none"> • Reference made in Publication Version Policy BG1. • Policy approach considered appropriate for reasons set out in its introductory text. Reference is made to Green Infrastructure Statements being submitted with planning applications. These will provide an opportunity for the planning applicant to set out how their proposal responds to the expectations of the policy. • Publication Version Policy BG1 clarifies approach regarding standards for green infrastructure provision. These relate to Natural England’s Green Infrastructure Standards, part of its Green Infrastructure Framework launched in January 2023. • Natural England’s comments: <ul style="list-style-type: none"> ○ Publication Version Policy BG1 amended. Introductory text now refers to the West of England Joint Green Infrastructure Strategy and how it sets out green infrastructure priorities and project at a sub-regional level. The policy wording now refers to ensuring the integrity and connectivity of the Nature Recovery Network and wider network of green and blue infrastructure across the city will be maintained, protected, enhanced and restored. This reflects priorities set out in the West of England Joint Green Infrastructure Strategy. ○ Policy provisions considered to set out clear expectations for what

Main issues raised	How they were addressed
<p>whether they were mandatory or matters that developments should try to achieve.</p> <ul style="list-style-type: none"> ○ Application of urban greening factor was most effective for promoting green infrastructure. ○ Minimum standards for the provision of integrating green infrastructure features should be included. ○ Policy wording should be amended so that developments take 'all' available opportunities to deliver multifunctional benefits relating to green infrastructure. 	<p>proposals should achieve.</p> <ul style="list-style-type: none"> ○ Publication Version Policy BG1 amended to make reference to this as part of Natural England’s Green Infrastructure Standards. ○ Publication Version Policy BG1 amended to make reference to Natural England’s Green Infrastructure Standards. ○ Publication Version Policy BG1 amended to make reference to this.

Draft Policy BG2: Nature Conservation

Table 181 - main issues raised on Draft Policy BG2: Nature Conservation and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Bristol Parks Forum sought clarity on: <ul style="list-style-type: none"> ○ definition of mitigation. ○ how policy will help to maintain and enhance the nature 	<ul style="list-style-type: none"> ● Bristol Parks Forum comments: <ul style="list-style-type: none"> ○ Mitigation considered to be readily understood term. ○ Local Plan Publication Version Policy BG2 ‘Nature Conservation and Recovery’ amended. Reference is now made to development being

Main issues raised	How they were addressed
<p>network.</p> <ul style="list-style-type: none"> • Strengthen policy with additional references to / emphasis on: <ul style="list-style-type: none"> ○ replacing ‘expected’ and conditional language with ‘must’; specific types of biodiversity improvement such as bee and swift bricks; producing an SPD to ensure effective delivery of biodiversity improvements; making clear Bristol Avon is functionally connected to the River Severn and Avon Gorge. • Reference to development which would result in significant harm to biodiversity which cannot be appropriately mitigated ‘will not’ be permitted inconsistent with the NPPF’s use of ‘should not’. • Natural England thought policy should refer to nature recovery rather than conservation to better recognise wider expectations placed on plans to strategically plan 	<p>expected to take all available opportunities to connect to or enhance the integrity of the Nature Recovery Network and wider ecological networks.</p> <ul style="list-style-type: none"> • Draft policy provisions and references considered reasonable and proportionate. Approach maintained for Publication Version Policy BG2. • Draft wording considered appropriate. • Title of policy amended for Local Plan Publication Version. Reference is also now made in the policy to development being expected to take all available opportunities to connect to or enhance the integrity of the Nature Recovery Network and wider ecological networks.

Main issues raised	How they were addressed
<p>for the natural environment.</p> <ul style="list-style-type: none"> • North Somerset Council thought the policy should distinguish between the hierarchy of international, national and locally designated sites. 	<ul style="list-style-type: none"> • Amended Publication Version Policy BG2 addresses this.

Draft Policy BG3: Achieving Biodiversity Gains

Table 182 - main issues raised on Draft Policy BG3: Achieving Biodiversity Gains and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Clarification sought on aspects of policy and its implementation: <ul style="list-style-type: none"> ○ What period management plans need to cover and their monitoring. ○ Where legal responsibility for delivering biodiversity net gain lies if landowner and developer are different. ○ Criteria used to determine if off-site biodiversity net gain or compensation is considered to be an acceptable approach. ○ How habitat management measures in Biodiversity Gain Plans would be enforced. 	<ul style="list-style-type: none"> • Clarifications sought: <ul style="list-style-type: none"> ○ Reference to management plans and monitoring removed from Local Plan Publication Version Policy BG3 'Achieving Biodiversity Gains'. Supporting text to draft policy referred to Biodiversity Gain Plans being expected to detail appropriate long-term habitat management measures and that this will be required to be maintained for 30 years following completion of the development. This text has been included within Publication Version Policy BG3. <p>The preparation of additional guidance is also referred to. This will provide more information on the detailed implementation of this policy, supported by Government guidance.</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Appropriateness of policy questioned given provisions for biodiversity net gain already included in Environment Act 2021. • Concern about viability of achieving 10% biodiversity net gain on small sites. • Flexibility in applying policy requirements needed for sites with heritage constraints. • Alternative policy approach suggested whereby developers should be expected to either achieve 10% biodiversity net gain on site or meet the requirements of a suitably determined minimum score for biodiversity for the city. • Biodiversity net gain target should be higher than 10%. • Clarify policy approach for development impacting on ancient woodland and veteran trees. • Concern about approach allowing off-site net gain measures as risks exporting biodiversity away from where it is needed. • Define 'last resort' in relation to off-site habitat 	<ul style="list-style-type: none"> • Policy considered appropriate for reasons set out in its introductory text. • Policy reflects the Environment Act 2021. • Policy reflects the Environment Act 2021. Flexibility provided, e.g. by allowing off-site measures if on-site solutions cannot be achieved. • Policy approach considered appropriate and in accordance with the Environment Act 2021. • Policy target considered suitable. Text has been added to Publication Version Policy BG3 to encourage developments to secure greater than the minimum level. • Text has been added to Publication Version Policy BG3 to make clear that impacts on irreplaceable habitats cannot be mitigated by biodiversity net gain. • Draft policy approach considered appropriate and reflecting the Environment Act 2021. Text has however been added to this section of Publication Version Policy BG3 to emphasise that off-site biodiversity gain should be provided in a location as close as feasible to the site that would contribute to the Nature Recovery Network and, where possible, have a meaningful ecological relationship to the development. • Text has been added to Publication Version Policy BG3 to clarify that these

Main issues raised	How they were addressed
<p>payment compensation.</p> <ul style="list-style-type: none"> • Clarity how ‘close’ off-site biodiversity net gain should be to the site. • In relation to directing proposed habitat and compensation measures towards opportunity projects, the Bristol Avon Catchment Plan 2022-2027 could be referred to. • Natural England suggested Bristol’s parks and greenspaces should be included as habitat banks for biodiversity net gain units to ensure biodiversity impacts by developments are mitigated in areas close to proposals. 	<p>circumstances would be where no suitable off-site location can be found.</p> <ul style="list-style-type: none"> • Text has been added to Publication Version Policy BG3 to state that off-site biodiversity gain should be provided in a location as close as feasible to the site that would contribute to the Nature Recovery Network and, where possible, have a meaningful ecological relationship to the development. • Text has been added to Publication Version Policy BG3 to explain that newly created habitat and compensation measures will be directed towards opportunity projects for biodiversity restoration identified within the West of England Joint Green Infrastructure Strategy or locations that would enhance wider ecological networks identified by the Nature Recovery Network or the emerging Local Nature Recovery Strategy. • It is considered that this issue will be addressed through text added to Publication Version Policy BG3. This explains that newly created habitat and compensation measures will be directed towards opportunity projects for biodiversity restoration identified within the West of England Joint Green Infrastructure Strategy or locations that would enhance wider ecological networks identified by the Nature Recovery Network or the emerging Local Nature Recovery Strategy.

Draft Policy BG4: Trees

Table 183 - main issues raised on Draft Policy BG4: Trees and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Request for more emphasis on / reference to: role of trees in climate resilience; their food growing potential; ‘requiring’ 	<ul style="list-style-type: none"> • Wording of draft policy considered appropriate, proportionate and reflecting national planning policy. Approach maintained for Local Plan Publication Version Policy BG4 ‘Trees’.

Main issues raised	How they were addressed
<p>development to meet the policy's provisions rather than 'expecting'; highlighting importance of trees in national policy; the Ancient Woodland and Ancient Tree Inventory; Bristol's urban forest as part of the wider West of England Nature Recovery Network.</p> <ul style="list-style-type: none"> • Tree canopy cover target needed. • Amend policy to require new streets to be tree lined only where feasible or viable. • Objection to tree replacement standard which indicates that trees with a trunk diameter of less than 15cm need not be replaced. • Cross-reference to biodiversity net gain policy. • Amend policy to state that replacement tree provision should only be acceptable where tree loss or damage is essential for safety. • Replacement trees should be provided within one mile of development site. 	<ul style="list-style-type: none"> • Draft policy makes reference to increasing tree canopy cover and this is maintained in Local Plan Publication Version Policy BG4. • It is considered that this is addressed in the draft policy's reference to development taking practicable opportunities to deliver tree lined streets. • Publication Version Policy BG4 'Trees' amended so that a replacement tree will be needed for a tree with a diameter of 7-19.9cm. • Publication Version Policy BG4 'Trees' amended to explain relationship to Policy BG3 'Achieving Biodiversity Gains'. • Draft policy referred to replacement tree provision being acceptable where tree loss or damage is essential to allow for appropriate development. This wording is considered suitable and proportionate and is maintained in Publication Version Policy BG4. • Draft policy's reference to replacement trees being located as close as possible to the development site is considered appropriate and maintained in Publication Version Policy BG4.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Approach to ancient woodland and ancient or veteran trees: <ul style="list-style-type: none"> ○ Strengthen policy to not permit any development which affects ancient or veteran trees. ○ Policy inconsistent with NPPF which allows development for exceptional reasons. • Policy requirements should only be applicable where feasible and viable, and that a financial contribution should be acceptable if not possible to provide replacement trees on-site. • Environment Agency thought the policy should be strengthened to make clear that any tree placement that impacts operational access to a designated main river or results in an increase in flood risk must be avoided. 	<ul style="list-style-type: none"> • Draft policy's reference to development which would result in the loss of ancient or veteran trees not being permitted is considered appropriate and maintained in Publication Version Policy BG4. • Draft policy considered appropriate for reasons set out in explanatory text. Policy also makes reference to the council's Planning Obligations Supplementary Planning Document which sets out the approach for off-site tree provision. Approach maintained for Publication Version Policy BG4. • It is considered that this issue is addressed in Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.

Draft Policy BG5: Biodiversity and access to Bristol's waterways

Table 184 - main issues raised on Draft Policy BG5: Biodiversity and access to Bristol's waterways and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • More precise standards and criteria needed to ensure policy can be used for assessment of proposals. 	<ul style="list-style-type: none"> • Draft policy wording considered sufficiently clear and approach maintained in Local Plan Publication Version Policy BG5 'Biodiversity and access to Bristol's waterways'.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Too great a focus on walkways; increased emphasis needed in relation to biodiversity and nature recovery. • Policy should reflect increased potential for active and leisure uses. • Policy too restrictive as would prevent any development that does not conserve the nature conservation value of waterways and adjacent land, regardless of biodiversity net gain provision. • Environment Agency felt the policy should be revised to: <ul style="list-style-type: none"> ○ Ensure new development is set back from river. 	<ul style="list-style-type: none"> • Issue considered to be adequately addressed in draft policy's reference to proposals conserving and enhancing the nature conservation value of waterways and adjacent land, including both habitats and species, and deliver biodiversity net gain. Approach maintained in Publication Version Policy BG5. • Issue considered to be addressed in draft policy's reference to proposals maintaining, enhancing and creating suitable, high-quality publicly accessible green infrastructure for walking and cycling. • Draft policy approach considered appropriate for reasons set out in its introductory text. Approach maintained for Publication Version Policy BG5. • Environment Agency comments: <ul style="list-style-type: none"> ○ It is considered that this is addressed with the draft policy's references to proposals conserving and enhancing the nature conservation value of waterways and adjacent land, and enabling long-term safe access, stewardship and maintenance of waterways and watersides. <p>It will also be addressed by Local Plan Publication Version Policy BG1 'Green Infrastructure and biodiversity in new development'. This states that the integrity and connectivity of the Nature Recovery Network and wider network of green and blue infrastructure across the city will be</p>

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Safeguard land to assist with delivery of emerging Bristol Avon Flood Strategy. 	<p>maintained, protected, enhanced and restored.</p> <p>Similarly, Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’ sets out the ten characteristics of well-designed places. This includes ‘Nature’ and sets out that existing blue/green infrastructure in and around the site should be retained and integrated into development proposals.</p> <ul style="list-style-type: none"> ○ This is addressed in Local Plan Publication Version Policy FR2 ‘Bristol Avon Flood Strategy’. This states that development located within or adjacent to areas that are essential for the delivery of future flood defences will be expected to accommodate space for and / or deliver flood protection infrastructure required as part of the development of the area.

Food sustainability

Draft Policy FS1: The provision of allotments

Table 185 - main issues raised on Draft Policy FS1: The provision of allotments and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy should seek allotment provision from commercial developments. • Expand policy to protect community growing spaces / gardens, food growing enterprises, smallholdings and social eating spaces. 	<ul style="list-style-type: none"> • Policy sets out requirement for new large residential developments to provide allotment space for residents. Not considered reasonable to seek provision from commercial developments as they do not lead to an increase in residents or deficiency in supply. • Addressed in Local Plan Publication Version Policy FS3 ‘The protection of existing food growing enterprises and allotments’.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Concern that allotment provision will decrease area that can deliver housing. • Policy needs to be assessed for any impacts on overall viability of development. • Any offsite allotment provision and financial contributions should be used to benefit the local area. • 60 dwelling threshold: <ul style="list-style-type: none"> ○ Lack of justification; ○ Should be lower – 20 suggested. • For larger developments, allotment provision should be increased relative to their size, i.e. no upper ceiling of 250m². 	<ul style="list-style-type: none"> • Proposed approach considered reasonable and supported by national planning policy. • Local Plan supported by viability assessment. • Approach to planning obligations addressed in Local Plan Publication Version Policy IDC1 ‘Development contributions and CIL’ and Planning Obligations supplementary planning document. • Justification for 60 dwelling threshold provided in explanatory text to policy. • Confirmed in explanatory text to policy with its reference to larger developments providing proportionately more allotment space.

Draft Policy FS2: Provision of food growing space within new developments of all scales

Table 186 - main issues raised on Draft Policy FS2: Provision of food growing space within new developments of all scales and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Objection to lack of development threshold above which on-site food growing space would be required. • Details needed about the food growing space to be incorporated. • This type of provision should be counted as an open space contribution 	<ul style="list-style-type: none"> • Approach considered reasonable and supported by national planning policy. • Additional detail provided in explanatory text to Local Plan Publication Version Policy FS2 ‘Provision of food growing space in new developments’. • Supporting text to policy explains that provision of food growing space may be seen as a part of a development’s wider green

Main issues raised	How they were addressed
<p>and not additional to this.</p> <ul style="list-style-type: none"> • Policy should require remediation of land to be used for food growing. • Clarity sought on: <ul style="list-style-type: none"> ○ definition of terms ‘long term occupation’, ‘suitable space’, and ‘appropriate size, quality and design’; ○ whether policy applies to student accommodation schemes. • Policy should specify how much space is required per dwelling or person. 	<p>infrastructure. Open space contributions are addressed in Local Plan Publication Version policy GI A ‘Open Space for Recreation’.</p> <ul style="list-style-type: none"> • Remediation of land addressed in Local Plan Publication Version policy HW1B ‘Contaminated land’. • Clarifications sought: <ul style="list-style-type: none"> ○ Additional detail on application of policy provided in explanatory text to Local Plan Publication Version Policy FS2 ‘Provision of food growing space in new developments’. ○ Purpose-built student accommodation schemes which house term time-only occupants would be unlikely to be considered as being intended for permanent or long-term occupation. • A space standard approach not considered appropriate as the ability of residential development proposals to provide food growing opportunities will depend on site / location-specific considerations. Instead, the policy requires applicants to demonstrate how their proposals have sought to incorporate food growing opportunities into their wider landscaping and design.

Draft Policy FS3: The protection of existing food growing enterprises

Table 187 - main issues raised on Draft Policy FS3: The protection of existing food growing enterprises and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy lacks justification, clarity and is inconsistent with national planning policy. • Expand policy to: <ul style="list-style-type: none"> ○ Protect local community gardens; 	<ul style="list-style-type: none"> • Approach considered reasonable and supported by national planning policy. • Policy expansion requests: <ul style="list-style-type: none"> ○ Supporting text to policy makes reference to community gardens.

<ul style="list-style-type: none"> ○ Require protection of best and most versatile soils; ○ Specify amount of food growing land being made available for active cultivation ward by ward; ○ Preserve food growing enterprises even if they are temporarily considered non-operational. ● More explanation needed on what would be 'unacceptable impact'. 	<ul style="list-style-type: none"> ○ Almost all of Bristol is designated as urban land. There is only a very small area of the best and most versatile agricultural soils within Bristol's boundaries. This is largely already developed, occupied by food growing uses or covered by other protective designations. The approach to protect existing food growing enterprises expands protections to food growing enterprises across the city. ○ The policy relates to the protection of existing food growing enterprises and so this is not relevant to the policy's requirements. ○ Existing wording considered reasonable and sufficient. ● Existing wording considered appropriate. Supporting text to the policy provides more explanation on potential impacts.
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Shopping, Services and the Evening Economy

Draft Policy SSE1: Supporting Bristol's centres – network and hierarchy

Table 188 - main issues raised on Draft Policy SSE1: Supporting Bristol's centres – network and hierarchy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● 15-minute city references: more detail / clarification sought, e.g. on its meaning; how key services would be located within a 15-minute distance; how it applies to people with mobility issues; whether it applies to 	<ul style="list-style-type: none"> ● Policies in the Local Plan Publication Version chapter on 'Centres, shopping and the evening economy' support the broad aim of a 15-minute city where facilities and services are close to people's homes.

Main issues raised	How they were addressed
<p>hospitality / evening economy uses.</p> <ul style="list-style-type: none"> • Proposed hierarchy of centres: <ul style="list-style-type: none"> ○ Bath and North East Somerset Council emphasised importance of dialogue on implications for local centre provision in development proposals in B&NES close to Bristol. ○ South Gloucestershire Council sought clarity on: <ul style="list-style-type: none"> a) where areas for growth and regeneration sit in centre hierarchy; b) the scale and type of town centre development likely to be needed given this could affect potential for new centres in South Gloucestershire; and c) whether primary and secondary shopping areas for town, district and local centres will be retained. • Concern that policy does not address noise pollution and promotes potentially anti-social activities. 	<ul style="list-style-type: none"> • Proposed hierarchy of centres: <ul style="list-style-type: none"> ○ Appropriate dialogue has taken place in preparing the Local Plan Publication Version. ○ The draft policy sets out the network and hierarchy of centres in Bristol. Where centres are also located in areas of growth and regeneration the relevant policies for centres continue to apply. Approach maintained for Publication Version policy. ○ The type and scale of development is set out in the policy and its supporting text. ○ Primary shopping areas referred to draft policies SSE1 and SSE2, with the approach maintained for the Local Plan Publication Version. Secondary shopping frontages no longer supported in national policy. • Issue covered by a number of Local Plan Publication Version policies including HW1 'Pollution control and water quality' and HW1A 'Noise'. Policy SSE3 'Supporting

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Approach to encouraging residential uses: <ul style="list-style-type: none"> ○ Needs to be more restrictive so that residential uses do not harm commercial or cultural function of centres, e.g. require applicants to demonstrate excess supply of commercial units prior to residential uses being allowed. ○ Clarify whether residential development includes build to rent and student accommodation schemes. • Comments on proposed centres: <ul style="list-style-type: none"> ○ Whiteladies Road – boundary should include additional areas to the south towards Oakfield Road and the Royal West of England Academy. ○ Ridingleaze – Lawrence Weston 	<p>Bristol’s evening, night-time and culture economy’ also expects new evening and night-time economy uses to be neighbourly, having regard to the character of the centre where they are proposed. Policy DPM1 ‘Delivering well-designed, inclusive places’ also requires development to providing a safe environment for future occupiers.</p> <ul style="list-style-type: none"> • Approach to encouraging residential uses: <ul style="list-style-type: none"> ○ Issue addressed in draft Policy SSE3 ‘Supporting Bristol’s evening and night-time economy’ and HW1 ‘Pollution Control and Water Quality’ in connection with the ‘agent of change’ principle. ○ Clarification considered unnecessary as policy’s main aim is to protect primary shopping areas from inappropriate change. • Comments on proposed centres: <ul style="list-style-type: none"> ○ Whiteladies Road boundary considered to reflect extent of the centre. ○ Policy is intended to identify Ridingleaze District Centre as part of the retail

Main issues raised	How they were addressed
<p>Neighbourhood Planning Forum suggest reference is made to the centre's regeneration plan being produced by the forum.</p> <ul style="list-style-type: none"> ○ Alma Vale Road, Clifton – boundary should be drawn to include entire length of shop frontages on both sides of Alma Vale Road. ○ Filwood Broadway – Knowle West Regeneration Residents Planning Group suggest this should be a district rather than local centre. ○ St. Peter's Rise, Bishopsworth – boundary should include shops further back along Bishopsworth Road and at junction with Bridgewater Road. Environment Agency thought designation should be revisited due to a culverted water course passing through area. ○ Two Mile Hill Road – boundary map not included in Appendix 2. 	<p>hierarchy. The local plan refers to the Lawrence Weston Neighbourhood Development Plan.</p> <ul style="list-style-type: none"> ○ Alma Vale's boundaries have been amended. ○ Filwood Broadway currently has the characteristics of a local centre. ○ The boundary at St Peter's Rise is considered to accurately reflect the extent of the centre. ○ Boundaries will be included in policies map, and a reference to Kingswood Town Centre has been added.

Main issues raised	How they were addressed
<p>To assist in application of sequential test, South Gloucestershire Council advised policy should refer to Two Mile Hill Road centre as being part of Kingswood Town Centre and having proximity to other South Gloucestershire centres.</p> <ul style="list-style-type: none"> • New centres suggested for inclusion in the network of centres: Whiteladies Road South; Kellaway Avenue; Ashley Down Road; Cotham Road South; Broad Plain/Temple Quay • Approach to creation of new centres: National Highways felt policy should include reference to incorporation of permeable and sustainable transport networks to facilitate ease of movement across new centres. 	<ul style="list-style-type: none"> • New centres: <ul style="list-style-type: none"> ○ Kellaway Avenue has now been added to the list of local centres. ○ Ashley Down Road has now been added as a local centre. ○ Cotham Road South was added as a local centre. <p>The southern end of Whiteladies Road past Belgrave Road has a different concentration of Use Class E(a) uses in comparison to the section of Whiteladies Road identified in the centre.</p> <ul style="list-style-type: none"> ○ Broad Plain / Temple Quay is part of the city centre. • These matters addressed in the Local Plan’s transport policies.

Draft Policy SSE2: Development in Bristol’s Centres

Table 189 - main issues raised on Draft Policy SSE2: Development in Bristol’s Centres and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy should better reflect the need to value local centres as areas for local services. • Objection to policy’s general opposition to residential uses within ground floor frontage of primary shopping areas. Contradiction between this policy and Bristol City Centre Framework, with the latter supporting residential development which complements retail uses within primary shopping areas. • Proposal for environmental enhancement to be provided as part of major development proposals should be flexible in terms of enhancements sought. 	<ul style="list-style-type: none"> • Importance of local centres reflected in approach of draft policies SSE1 and SSE2. • Draft policy explains importance of protecting primary shopping areas, therefore approach considered appropriate and maintained in Local Plan Publication Version. • Policy considered proportionate and flexible.

Draft Policy SSE3: Supporting Bristol’s evening and night-time economy

Table 190 - main issues raised on Draft Policy SSE3: Supporting Bristol’s evening and night-time economy and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Policy should also support opportunities for new late-night venues. • Concern that policy favours operation of late-night businesses and commercial interests over the health 	<ul style="list-style-type: none"> • Addressed in draft policy which supports proposals which contribute to the vitality and viability of Bristol’s evening and night-time economy. • Draft Policy SSE3 expects new evening and night-time economy uses to be neighbourly, having regard to the character of the centre where they are proposed. Also relevant will

Main issues raised	How they were addressed
<p>and wellbeing of residents.</p> <ul style="list-style-type: none"> Policy wording on cultural venues should be expanded to include specific reference to 'theatres and other performance venues'. 	<p>be Local Plan Publication Version policies in the 'Health, wellbeing and food sustainability' chapter, including HW1 'Pollution control and water quality' and HW1A 'Noise'.</p> <ul style="list-style-type: none"> Policy wording on cultural venues would include theatres and other performance venues.

Draft Policy SSE4: Town Centre First Approach to Development

Table 191 - main issues raised on Draft Policy SSE4: Town Centre First Approach to Development and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Concern that approach places undue limits on the flexibility of Use Class E uses, e.g. in relation to requiring impact assessments. Proposed sequential approach: for main town centre use applications equal to or less than the amount of floor space currently present on the site, sequential approach should not apply. 	<ul style="list-style-type: none"> Policy aim of retaining existing Use Class E uses within identified centres considered appropriate. Sequential approach set out in draft policy considered appropriate and in accordance with national planning policy.

Draft Policy SSE5: Temporary Uses in Centres

Table 192 - main issues raised on Draft Policy SSE5: Temporary Uses in Centres and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Objection to blanket ban on use of vacant sites for car parking as they could be useful for accessibility reasons (e.g. for older 	<ul style="list-style-type: none"> Draft policy considered appropriate for reasons set out in explanatory text. Approach maintained for Local Plan Publication Version.

Main issues raised	How they were addressed
<p>people) without undermining sustainable travel.</p> <ul style="list-style-type: none"> Requiring meanwhile uses to enhance local character and amenity of surrounding area felt to be onerous; neutral impacts should be acceptable. 	<ul style="list-style-type: none"> Draft policy felt to be appropriate as it is considered these uses should have a positive impact.

Draft Policy SSE6: Retaining and Enhancing Markets

Table 193 - main issues raised on Draft Policy SSE6: Retaining and Enhancing Markets and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Proposals for new street or open markets: wording should state that new markets should complement local businesses and take other food / beverage offers nearby into account. 	<ul style="list-style-type: none"> The policy is supportive of the creation of new markets in the correct locations and further provisions are not considered necessary.

Draft Policy SSE7: Provision of public toilets

Table 194 - main issues raised on Draft Policy SSE7: Provision of public toilets and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Policy wording should be strengthened to ensure access is not restricted by any means and that facilities are appropriately maintained. Requirement for public toilet provision should only apply where it is viable, deliverable and where it would not have a negative effect on amenity. 	<ul style="list-style-type: none"> Draft policy refers to toilets being located at readily accessible parts of the development which facilitate public access. Approach considered appropriate for reasons set out in supporting text. Considerations of amenity are addressed in policies within the Local Plan Publication Version's 'Design and conservation' chapter.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Building Regulations requirements to provide ‘changing places’ toilets should not make a development unacceptable in situations where it cannot be achieved, e.g. due to building heritage considerations. • Objection to requirement for 24-hour access to facilities, given likely staffing costs and implications relating to crime prevention strategies. • Closed public toilets should be reopened and reinstated by the council before developers are required to provide new facilities. • Clarification sought on reference to ‘open to the public’ – define what is meant and clarify who will be allowed to use new facilities. 	<ul style="list-style-type: none"> • Material considerations always taken into account in assessment of planning applications. • Bristol is a 24-hour city which is recognised within the local plan. • This policy concerns the provision of new toilets as a result of development. • The term is considered clear.

Design

Proposed approach to the preparation of local design guides or codes

Table 195 - main issues raised on Proposed approach to the preparation of local design guides or codes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Approach not in line with Government's National Model Design Code guidance. 	<ul style="list-style-type: none"> • In light of changes to national planning policy Bristol City Council will prepare design guides and codes. These will support the policies in the Local Plan Publication Version's ‘Design and conservation’ chapter and provide more detailed guidance for developers as to what is expected in terms of

Main issues raised	How they were addressed
	design. A prospectus of this guidance will be appended to the Publication Version.

Draft Policy DC A: Delivering well-designed, inclusive places

Table 196 - main issues raised on Draft Policy DC A: Delivering well-designed, inclusive places and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Lack of reference to how design proposals should be developed through engagement with local communities. • Inclusion of specific matters sought: <ul style="list-style-type: none"> ○ Healthy Streets Approach should be adopted as part of the formal assessment of street design and transport schemes. ○ Text needed to support the creation of new parks and green spaces. • Policy too 'high level' to provide adequate detail for guiding for new 	<ul style="list-style-type: none"> • Text has been added to Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places' which states that major applications will be expected to show how the design of development has been informed by and responded to early, proactive and effective engagement with the community. • Specific matters sought for inclusion: <ul style="list-style-type: none"> ○ Supporting text to Local Plan Publication Version Policy T3A 'Transport development management' advises that the assessment of street designs will be led by the principles of the Manual for Streets and the council's Transport Development Management Guidance. Publication Version Policy DPM1 'Delivering well-designed, inclusive places' emphasises the importance of new development creating healthy places. ○ Text has been added to Policy DPM1 with reference to the 'nature' element of the ten characteristics of well-designed places. This emphasises how good design is expected to provide complementary and multi-functional blue/green infrastructure. • The Local Plan Publication Version includes a number of policies with relevance to design matters and which, taken together, provide sufficient detail for assessing planning

Main issues raised	How they were addressed
<p>development proposals.</p> <ul style="list-style-type: none"> • Use of ‘beautiful’ inappropriate as it is a subjective term. • Policy should require developers to undertake post-completion checks to ensure development meets original design specification. • Sport England advocated reference to its Active Design guidance and developer's checklist. • Section on criteria for achieving well-designed proposals: <ul style="list-style-type: none"> ○ Reference should be made to providing new green spaces and ensuring they are accessible and maintainable by residents. ○ Clarity sought on how ‘inclusive’ is to be interpreted. ○ National Grid thought the policy should be amended to ensure existing site constraints are respected, particularly relating to utilities. 	<p>applications.</p> <ul style="list-style-type: none"> • Support for use of ‘beautiful’ found in NPPF. • Post-completion issues are a planning enforcement matter. • Ensuring development proposals promote or provide opportunities for physical activity are addressed in a number of Local Plan Publication Version policies including Policy DPM1 ‘Delivering well-designed, inclusive places’, Policy T1 ‘Development and transport policies’ and Policy T6 ‘Active travel routes’. • Section on criteria for achieving well-designed proposals: <ul style="list-style-type: none"> ○ Text has been added to this section of Local Plan Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’ to refer to providing blue/green infrastructure and enabling long term stewardship of buildings and spaces. ○ ‘Inclusive’ is a term used in the NPPF. Its normal everyday meaning would be used when applying the policy. ○ Text has been added to the ‘Context’ element of this part of Policy DPM1 which explains that good design demonstrates an understanding and respect for an area’s unique built, natural and cultural characteristics.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Natural England considered that the requirement for inclusive design should reference green infrastructure designed to be safe and accessible to all. ● Section on Urban living: <ul style="list-style-type: none"> ○ Concern that the text on optimising densities implies that liveability can be compromised to achieve housing targets. ○ Minimum space standards should be included to ensure liveability, including standards for communal and play spaces. ○ South Gloucestershire Council considered that the policy wording could be strengthened to ensure densities are optimised. ● Section on Mixed-use development: <ul style="list-style-type: none"> ○ A mix of uses should only be required where feasible and appropriate to the 	<ul style="list-style-type: none"> ○ Text has been added to the 'Nature' element of this part of Policy DPM1 to explain that good design retains, integrates and provides blue/green infrastructure in and around the site, while the 'Public and communal spaces' element now includes reference to creating safe, secure, and attractive settings for the spaces. ● Section on Urban living: <ul style="list-style-type: none"> ○ The aim of Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places' is to ensure a balance is achieved between optimising site densities and achieving successful placemaking and liveability. Text has been added to DMP1 to provide more detail on the considerations that should ensure liveability in proposals for new dwellings. ○ This is addressed by Local Plan Publication Version Policy DC1 'Liveability in residential development including space standards and private outdoor space.' ○ This is addressed by Local Plan Publication Version policies UL1 'Effective and efficient use of land'; UL2 'Residential densities'; and DC1 'Liveability in residential development including space standards and private outdoor space'. ● Section on Mixed-use development: <ul style="list-style-type: none"> ○ NPPF advocates mixed-use development as a means of securing an efficient use of land and healthy, inclusive and safe places. Local Plan Publication Version Policy DPM1

Main issues raised	How they were addressed
<p>site's context.</p> <ul style="list-style-type: none"> ○ Clarity sought on how an appropriate mix of uses should be established for a site. ● Section on local character and distinctiveness: <ul style="list-style-type: none"> ○ Policy should recognise those circumstances where a scheme which would cause some harm to local character or distinctiveness is nevertheless acceptable given its overall planning merits. ○ Emphasis should be on requirement for development to mitigate harm rather than refusing schemes that will result in harm. ● Section on Co-ordinated development: <ul style="list-style-type: none"> ○ Policy should be re-written to allow schemes where there is no reasonable potential for a co-ordinated approach or where such an approach would result in delays to 	<p>'Delivering well-designed, inclusive places' expects major development proposals to provide or contribute to an appropriate mix of uses.</p> <ul style="list-style-type: none"> ○ Design and Access Statements which accompany major development proposals should address how an appropriate mix of uses has been provided or contributed to. ● Section on local character and distinctiveness: <ul style="list-style-type: none"> ○ The second paragraph of Draft Policy DC A which referred to development not being permitted where it would be harmful to local character and distinctiveness has been removed from Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places'. ○ The second paragraph of Draft Policy DC A which referred to development not being permitted where it would be harmful to local character and distinctiveness has been removed from Publication Version Policy DPM1. ● Section on Co-ordinated development: <ul style="list-style-type: none"> ○ It is considered that Draft Policy DC A provided sufficient flexibility as it referred to 'Where such potential may reasonably exist...'. This wording has been maintained in Local Plan Publication Version Policy DPM1 'Delivering well-designed, inclusive places'.

Main issues raised	How they were addressed
<p>deliverable sites being brought forward.</p> <ul style="list-style-type: none"> • Section on public art and cultural activity: <ul style="list-style-type: none"> ○ Greater flexibility required to recognise circumstances where it is not feasible or appropriate for new development to deliver public art or other cultural activity. ○ Clarity sought on developer’s role in delivering public art, e.g. would it be through financial contributions? ○ South Gloucestershire Council thought that consideration could be given to strengthening the policy’s wording to better enable public art and cultural activity delivery. 	<ul style="list-style-type: none"> • Section on public art and cultural activity: <ul style="list-style-type: none"> ○ Text has been added to Local Plan Publication Version Policy DPM1 ‘Delivering well-designed, inclusive places’ which clarifies the types of development the policy will apply to. It also provides more detail on the expectations for meeting the policy, e.g. that relevant proposals should demonstrate how the provision / promotion of public art and cultural activity has been addressed. ○ Supporting text has been added to Policy DPM1 which explains that applicants are encouraged to consider ways to incorporate space; commission cultural happenings; utilise artist-led design, such as lighting, wayfinding and landscaping; and temporary or permanent artworks in the public realm. The Design and Access Statement which accompanies the planning application should be used to set out how the provision/promotion of public art and cultural activity has been addressed in the proposal. ○ Text has been added to Publication Version Policy DPM1 to provide more detail on the expectations for major development proposals to address public art and cultural activity provision.

Draft Policy DC B: Advertisements

Table 197 - main issues raised on Draft Policy DC B: Advertisements and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Assessment of cumulative impacts of advertisements in an area should be included in policy. • Policy should cross-refer to aims of policies NZC1, BG2 and DC A to assist in addressing potential climate change, biodiversity and design impacts of advertisements. • Policy should place operating hours restrictions on illuminated advertisements to reduce carbon emissions. • Evidence to justify the policy questioned. • Criteria proposed to assess unacceptable impact: <ul style="list-style-type: none"> ○ Lack of clarity of terms used: ‘incongruous features’, ‘other nuisance’. 	<ul style="list-style-type: none"> • It is considered that this was addressed in the first bullet point of Draft Policy DC B. This referred to unacceptable amenity impacts being caused where advertisements create or <i>reinforce</i> an incongruous feature in its immediate neighbourhood. Similarly, cumulative impacts would also be assessed with reference to the policy’s second bullet point. This stated that unacceptable amenity impacts would be caused if advertisements result in harmful <i>clutter</i> of residential areas. The policy wording has been maintained for Local Plan Publication Version Policy AD1 ‘Advertisements’. • This is not considered necessary or appropriate. The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 restrict local planning authority powers in respect of the control of advertisements to amenity and public safety matters only. • Both Draft Policy DC B and Local Plan Publication Version Policy AD1 ‘Advertisements’ refer to the restriction of operating hours as a means of ensuring proposals for illuminated advertisements do not have harmful impacts. • The need to exercise appropriate controls over advertisements is considered reasonable and supported by the NPPF. • Criteria proposed to assess unacceptable impact: <ul style="list-style-type: none"> ○ The terms used in the policy are considered appropriate and allow judgements to be made on proposals in the light of local / site circumstances.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Potential for adverse effects should only be referred to where advertisements are not an established feature or if an area is wholly residential in character. ○ Policy should not refer to undue prominence on medium or long-distance views as context of proposed advert locations may mean they can be acceptable. ○ Additional criteria suggested: <ul style="list-style-type: none"> - Regard to visual amenity in any area of the city. - Enjoyment of green space. - Potential for intrusive light. 	<ul style="list-style-type: none"> ○ The need to exercise appropriate controls over advertisements is considered reasonable and supported by the NPPF. ○ Use of '<i>unduly prominent</i>' in the policy text to Draft Policy DC B allows consideration of context as an assessment will be made on the relative prominence of the proposal in its location. The policy wording has been maintained for Local Plan Publication Version Policy AD1 'Advertisements'. ○ Additional criteria suggested: <ul style="list-style-type: none"> - Not considered necessary to refer to 'any area of the city' as the policy will be applied city-wide. - This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1. For example, the third bullet point of Policy DC B refers to unacceptable impacts being caused from advertisements which detract from the character or setting of any feature of scenic interest. - This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1. The sixth bullet point of Policy DC B refers to unacceptable impacts from advertisements which result in a negative impact upon residents' living conditions by

Main issues raised	How they were addressed
<p>- Impacts relating to ease of movement.</p> <p>- Creation of well-designed, inclusive places.</p> <ul style="list-style-type: none"> • Criteria proposed relating to harmful impacts on public and road safety: <ul style="list-style-type: none"> ○ Reference to adverts obscuring views into an area should be updated to refer only to areas that are publicly accessible, and that there should be no restrictions on lawful advertisements which restrict views into private property. 	<p>reason of its illumination.</p> <p>- This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1. For example, the second bullet point of Policy DC B refers to unacceptable impacts resulting from advertisements which result in harmful clutter.</p> <p>- This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1 as the criteria seek to ensure advertisements do not have unacceptable amenity impacts. For example, the first bullet point of Policy DC B refers to unacceptable impacts resulting from advertisements which create or reinforce an incongruous feature in, or result in a negative visual impact on, its immediate neighbourhood.</p> <ul style="list-style-type: none"> • Criteria proposed relating to harmful impacts on public and road safety: <ul style="list-style-type: none"> ○ The approach is considered appropriate and allows a judgement to be made on the proposal in the light of local / site circumstances.

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ○ Policy should reference cyclists, pedestrians and wheelchair users as well as drivers in relation to visual distractions. ○ Policy should require advertisements to limit the potential for visual distractions in relation to the interpretation of road signs. ○ Additional criteria suggested, so that an advert will be considered harmful: <ul style="list-style-type: none"> - When it might encroach on personal privacy; and - Creates barriers in pedestrian areas. ○ Clarity sought on how adverts that 	<ul style="list-style-type: none"> ○ Local Plan Publication Version Policy AD1 ‘Advertisements’ amended to make reference to ‘road users’. ○ This is considered to be addressed in the final bullet point of Draft Policy DC B. The policy wording has been maintained for Local Plan Publication Version Policy AD1: Advertisements. ○ Additional criteria suggested: <ul style="list-style-type: none"> - It is considered that this matter was adequately addressed by Draft Policy DC B policy’s reference to unacceptable impacts from proposals which result in a negative impact upon residents’ living conditions by reason of its siting or illumination. The policy wording has been maintained for Local Plan Publication Version Policy AD1 ‘Advertisements’. - This is considered to be addressed in the policy wording of both Draft Policy DC B and Publication Version Policy AD1. For example, the eighth bullet point of Policy DC B refers to advertisements being harmful where they create an unwelcoming sense of enclosure. ○ The term ‘unwelcoming sense of enclosure’ is considered

Main issues raised	How they were addressed
create an 'unwelcoming sense of enclosure' will be assessed.	appropriate and allows a judgement to be made on proposals in the light of local / site circumstances.

Development locations and allocations

Land at Bath Road, Brislington

Table 198 - main issues raised on Land at Bath Road, Brislington and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Reasons for objection: lack of exceptional circumstances to justify Green Belt loss; ecological and green infrastructure significance of site; importance of site for mitigating flood risk; need to develop brownfield land before greenfield; pressure on existing amenities and services from resulting new development; increased pollution, congestion, and associated risks to road safety from new development. • Boundary should also include land north of A4 Bath Road, including Brislington Cricket Club. • Sport England thought that any development should provide new or enhanced sport and recreation facilities. • Environment Agency considered that detailed 	<ul style="list-style-type: none"> • Rationale for approach explained in 2022 consultation document and maintained in supporting text to Local Plan Publication Version Policy DS12 'New neighbourhood – Bath Road, Brislington'. • Boundary considered appropriate and maintained for Publication Version Policy DS12. • Provision of new or enhanced sport and recreation facilities will be secured where appropriate using Local Plan Publication Version policies IDC1 'Development contributions and CIL', CF1 'Provision of community facilities' and CF2 'Retention of community facilities'. • It is considered that this issue can be addressed as part of the preparation of a

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Natural England thought features of ecological value should be retained and enhanced and high quality accessible green infrastructure provided. 	<p>East Somerset to support improved transport facilities.</p> <ul style="list-style-type: none"> Text has been added to Publication Version Policy DS12 to refer to the retention of (and incorporation of new) important trees, hedgerows and other green infrastructure.

Land west of Silbury Road, Ashton Vale

Table 199 - main issues raised on Land west of Silbury Road, Ashton Vale and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Reasons for objection: nature conservation and green infrastructure significance of site; loss of access to land which has benefits for health and wellbeing; flood risk; lack of exceptional circumstances to justify Green Belt designation removal; increased pressure on local services; noise pollution from nearby recycling plant likely to affect new residents; potential land contamination issues; possible negative impacts on reopening of Portishead trainline. 	<ul style="list-style-type: none"> Proposal is maintained in Local Plan Publication Version Policy DS11 'Development allocations – southwest Bristol' with rationale provided in supporting text. Policy DS11 explains that land at Ashton Vale has now received planning permission (ref. 21/03166/P) for around 500 homes ('Longmoor Village').

Land adjacent to Elsbert Drive, Bishopworth

Table 200 - main issues raised on Land adjacent to Elsbert Drive, Bishopworth and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Reasons for objection: increase in pollution and congestion and associated 	<ul style="list-style-type: none"> Proposal is maintained in Local Plan Publication Version Policy DS11 'Development allocations – southwest

Main issues raised	How they were addressed
<p>risks to road safety; poor public transport connections; increased pressures on existing services and infrastructure; increase in noise pollution for existing residents; concerns about overshadowing and loss of privacy for existing residents; brownfield land development should be prioritised over greenfield; loss of valuable green space which has benefits for mental and physical health; nature conservation importance of site; loss of site important for climate change mitigation; flood risk; presence of redundant coal mines; deforestation and soil erosion; negative impact on water table; lack of exceptional circumstances to justify Green Belt release; site not large enough to accommodate significant amount of affordable housing.</p> <ul style="list-style-type: none"> ● Prospective developer of site thought: <ul style="list-style-type: none"> ○ It could support delivery of 150 dwellings. ○ Retention and incorporation of trees, hedgerows and green infrastructure should not be an 	<p>Bristol' with rationale provided in supporting text.</p> <ul style="list-style-type: none"> ● Prospective developer's comments: <ul style="list-style-type: none"> ○ Issues raised will be addressed by the provisions of Publication Version Policy DS11. This requires development at Elsbert Drive to be in accordance with a detailed cross-boundary development framework or master plan prepared in consultation with the local community which addresses the layout and form of development, access and the relationship with surrounding areas. It also requires development to

Main issues raised	How they were addressed
<p>absolute requirement.</p> <ul style="list-style-type: none"> ○ Biodiversity net gain requirement does not need to be included given this is mandatory in national planning policy. ○ Essential infrastructure requirements should be determined through planning application process. ○ Affordable housing requirement should be supported by viability testing. ○ Objection to community led/self-build housing requirement given likely site challenges. <ul style="list-style-type: none"> ● North Somerset Council thought that: <ul style="list-style-type: none"> ○ key development principles should include reference to vehicular access not being appropriate from South Bristol Link. ○ Affordable housing figure will need to be considered in relation to potential differing requirements in 	<p>address the residential amenity of existing homes on Elsbert Drive and accord with all the other relevant policies in this plan. Supporting text refers to an estimated housing capacity of 150 homes.</p> <p>Affordable and self-build housing provision will be sought in accordance with Publication Version policies AH1 'Affordable housing provision' and H5 'Self-build and community-led housing'.</p> <ul style="list-style-type: none"> ● North Somerset Council's comments: <ul style="list-style-type: none"> ○ It is considered that the issues raised will be addressed in the preparation of a detailed cross-boundary development framework or master plan prepared in consultation with the local community, referred to in Publication Version Policy DS11. This will address layout and form of development, access and relationship with surrounding areas. Other Local Plan Publication Version policies are likely to be relevant, including IDC1 'Development contributions and CIL'; BG1 'Green Infrastructure and biodiversity in new development';

Main issues raised	How they were addressed
<p>Bristol and North Somerset.</p> <ul style="list-style-type: none"> ○ Master-planning should include compensatory improvements to environmental quality and accessibility of remaining Green Belt land. 	<p>and Policy GI A ‘Open Space for Recreation’.</p>

Yew Tree Farm

Table 201 - main issues raised on Yew Tree Farm and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Prospective developer’s reasons for objecting to discontinuation of Yew Tree Farm development allocation: site is not considered to be part of a working farm; ecological impacts could be mitigated and green infrastructure improvements incorporated; development would form definitive edge to settlement boundary; site in sustainable location close to local facilities. 	<ul style="list-style-type: none"> ● The approach outlined in the 2022 consultation to discontinue the proposed development allocation has been maintained for the Local Plan Publication Version.

Green Belt boundary

Table 202 - main issues raised on Green Belt boundary and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> ● Reasons for objection included: brownfield development and urban intensification should be 	<ul style="list-style-type: none"> ● The approach outlined in the 2022 consultation has been maintained for the Local Plan Publication Version.

Main issues raised	How they were addressed
<p>prioritised over Green Belt development; lack of exceptional circumstances to justify Green Belt release; loss of green spaces that benefit human health and wellbeing, biodiversity, flood resilience and air quality.</p>	

Changes to existing site allocations

Western Slopes

Table 203 - main issues raised on Western Slopes and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> • Prospective developer’s reasons for objecting to discontinuation of existing site allocations BSA1108 ‘Land at Novers Hill, east of Hartcliffe Way and west of Novers Lane/Novers Hill’ and BSA1114 ‘Land at Novers Hill, adjacent to industrial units’: <ul style="list-style-type: none"> ○ conflict with housing provision policies as would lead to a lower level of housing delivery; development would provide policy-compliant level of affordable housing; site is in sustainable location in terms of access to services and facilities; inconsistent approach taken to how the ecological role of the site has 	<ul style="list-style-type: none"> • The approach outlined in the 2022 consultation has been maintained for the Local Plan Publication Version.

Main issues raised	How they were addressed
<p>been considered against other retained allocations in Local Plan review.</p>	

Brislington Meadows

Table 204 - main issues raised on Brislington Meadows and how they were addressed in the Local Plan

Main issues raised	How they were addressed
<ul style="list-style-type: none"> Landowner's reasons for objecting to discontinuation of existing site allocation BSA1201 'Land at Broomhill, Brislington': no evidence that ecological value of site has changed since allocation; allocation could help meet housing shortfall including 30% affordable housing; 10% biodiversity net gain could be achieved; site in highly sustainable location for housing development. 	<ul style="list-style-type: none"> The approach outlined in the 2022 consultation has been maintained for the Local Plan Publication Version. Planning permission for the development of up to 260 new residential dwellings on this site was granted planning permission in April 2023 (ref. 22/01878/P).

Appendix 1 – Local Plan Consultation Database

Throughout the preparation of the Local Plan, the council notified members of the Local Plan Consultation Database about opportunities for involvement and updates on progress. The approximately 2,500 members of the database fall within the following categories:

Specific consultation bodies

These are the organisations specified in the Town and Country Planning (Local Planning) (England) Regulations 2012 which the council is required to notify and invite representations from. It includes Government agencies such as Historic England and the Environment Agency, neighbouring councils and infrastructure providers, e.g. Bristol Water.

General consultation bodies

The council also sought involvement from what the Regulations describe as ‘general consultation bodies’. These include voluntary bodies, bodies which represent the interests of racial, ethnic, national, religious and disabled groups in the area, and bodies representing business in the area.

Other bodies and individuals

Engagement was also sought from residents, employees, businesses, community / interest groups, landowners, developers and all other parties who have expressed an interest in being involved in preparing the Local Plan.

Appendix 2 – Consultation methods used

Stage 1 – Local Plan Review: Consultation (2018)

Consultation methods used:

Consultation document

In February 2018 the council published the ‘Bristol Local Plan Review: Consultation’ document. Comments were sought for eight weeks between 19th February and 13th April 2018.

The document was made available for inspection in the city’s public libraries and City Hall. Hard copies were made available free to community groups and organisations on request.

Emails and letters

Members of the Local Plan Consultation Database were notified by email and letter.

Press release

A press release was published on 19th February to raise awareness about the consultation with local news outlets and publications.

Social media

An article about the consultation document was published on the Ask Bristol Twitter and Facebook account.

Website

The consultation document was promoted on the council’s website including its Newsroom and Planning Policy pages. It was also publicised on the council’s Consultation and Engagement Hub (‘Ask Bristol’) where an online survey was provided. An article was also sent to subscribers to the council’s email news alert ‘Our City’.

Discussion event

A discussion event attended by approximately 60 members of the Local Plan Consultation Database was held in City Hall on 6th March 2018. As well as an introduction to the consultation, this event enabled stakeholders to ask questions and discuss the initial proposals with officers.

Meetings

Officers attended meetings of the following groups and organisations to present information about the consultation document and answer questions:

- 14th March – St Paul’s Planning Group
- 20th March – Avonmouth Planning and Liaison Group

- 21st March – Bristol CCI Planning and Transport Group
- 22nd March – Lockleaze Residents Planning Group
- 28th March – Bristol Green Capital
- 29th March – Ambition Lawrence Weston
- 9th April – Hartcliffe, Withywood and Bishopsworth Pride of Place Group
- 9th April – Hotwells and Cliftonwood Community Association
- 18th April – Knowle West Planning Group
- 28th April – Bristol Parks Forum

Drop-in exhibition / event

A drop-in exhibition / event was held in Bristol Central Library on 12th March between 2 – 6.30pm to enable the public to discuss the initial proposals with council officers.

Stage 2 – Local Plan Review: Draft Policies and Development Allocations – Consultation (2019)

Consultation methods used:

Consultation documents

In March 2019 the council published the ‘Bristol Local Plan Review: Draft Policies and Development Allocations – Consultation’ document. Comments were sought for nine weeks between 18th March and 17th May 2019.

The documents were made available for inspection in the city’s public libraries and City Hall and placed on the council’s website, along with a questionnaire. Hard copies were made available free to community groups and organisations on request.

Emails and letters

Members of the Local Plan Consultation Database were notified by email and letter.

Press release and launch

A press release was published to raise awareness about the consultation and articles were included in a number of local news outlets and publications including the Bristol Post (27th March, 12th April, 16th and 22nd May) and South Bristol Voice (April).

The Mayor of Bristol also attended a press launch for the consultation held at the Hub, Gainsborough Square, Lockleaze on 18th March.

Social media

An article about the consultation document was published on the Ask Bristol Twitter feed.

Website

The consultation document was promoted on the council’s website including its Newsroom and Planning Policy pages. It was also publicised on the council’s Consultation and Engagement Hub (‘Ask Bristol’) where an online questionnaire was provided. An article was also sent to subscribers to the council’s email news alert ‘Our City’.

Drop-in exhibitions / events

Four drop-in exhibitions / events were held to enable local people to discuss the draft policies and proposals with council officers.

- 23rd April – Greenway Centre, Southmead BS10 5PY, 2.30-6.30pm
- 25th April – @symes Community Building, Hartcliffe BS13 0BE, 2.30-6.30pm
- 30th April – Central Library, Bristol BS1 5TL, 12-6.30pm
- 9th May – Central Library, Bristol BS1 5TL, 2.30-6.30pm

Meetings

Officers attended meetings of the following groups and organisations to present information about the consultation document and answer questions:

- 21st March – Bristol Homes and Communities Board
- 9th April – Bristol Neighbourhood Planning Network
- 11th April – Thriving South Bristol
- 15th April – Western Harbour stakeholder group
- 30th April – St Philip’s Marsh planning groups
- 1st May – Bristol Civic Society
- 1st May – Lawrence Hill planning groups
- 2nd May – Parks Forum
- 7th May – Business West Planning and Transport Group
- 9th May – Bishopsworth planning groups
- 13th May – Bristol Property Agents Association
- 15th May – Knowle West Future
- 16th May – Greater Brislington Together
- 20th May – Hartcliffe and Withywood Community Partnership
- 20th May – Homes West
- 22nd May – St Paul’s Planning Group
- 10th June – Bristol Disability Equality Forum

Stage 3 – Local Plan Review: Draft Policies and Development Allocations – Further consultation (2022)

Consultation methods used:

Consultation document

In November 2022 the council published the ‘Bristol Local Plan Review: Draft Policies and Development Allocations – Further consultation’ document. Comments were sought for seven weeks between 28th November 2022 and 20th January 2023.

The document was made available for inspection in the city’s public libraries and City Hall and placed on the council’s website, along with a questionnaire. Hard copies were made available free to community groups and organisations on request.

Emails and letters

Members of the Local Plan Consultation Database were notified by email and letter.

Press release and launch

A press release was published on 30th November to raise awareness about the consultation. Articles were included in a number of local news outlets and publications including the Bristol Post (5th December).

Social media

An article about the consultation document was published on the Ask Bristol Twitter feed.

Website

The consultation document was promoted on the council’s website including its Newsroom and Planning Policy pages. It was also publicised on the council’s Consultation and Engagement Hub (‘Ask Bristol’) where an online questionnaire was provided.

Meetings

Officers attended meetings of the following groups and organisations to present information about the consultation document and answer questions:

- 25th October – Bristol Neighbourhood Planning Network
- 30th November – One City Environment Board
- 30th November – Bristol Green Capital Partnership – Sustainable planning group
- 12th December – Bristol Advisory Committee on Climate Change
- 15th December – Bristol Civic Society
- 5th January – South Bristol planning groups

- 11th January – St Philips Marsh and Old Market planning groups
- 12th January – Bishopston, Redland, Cotham Community Partnership
- 12th January – Bristol Advisory Committee on Climate Change
- 17th January – Easton planning groups
- 23rd February – Bristol Property Agents Association