



an independent force for a **better Bristol**

May 2019

Consultation response to Local Plan review (second consultation)

1 Introduction

The Society supports most of the Local Plan review. It covers all the right issues that have arisen since the previous Plan was written. However, there remain some aspects which the Society suggests could be improved.

2 Main points

2.1 Section 4: Development Strategy – the spatial framework guidelines could be strengthened

We support spatial frameworks for all areas of growth. We recognise that the Council is unable to resource the production of spatial frameworks for *all* the areas, and it is therefore important that the Local Plan gives clear guidance to developers to ensure that the right framework is produced at the right time. We think that the draft guidance could be strengthened and we have suggested revised wording – see section 3 below.

It is important to avoid the Bedminster Green situation where the process for producing a spatial framework has not worked well. We note that there are two growth areas - Lawrence Hill and Central Fishponds - which will both rely on developer-produced spatial frameworks and are considered appropriate for tall buildings. We think it is these two areas which are most at risk of repeating the planning failure of Bedminster Green. In particular, we suggest that the Council takes on responsibility for producing a framework for the area of and around the Lawrence Hill roundabout.

2.2 Section 9: Shopping – the section should allow more for retail trends

No change in policy is planned for shopping areas. It is claimed that the existing policies "provide a very flexible approach to supporting centres whilst accommodating the changing face of the high street". However, we have suggested policy wording that does respond to retail trends – see section 3 below.

2.3 Section 11: Transport – the section could be strengthened

We accept that the NPPF does not set out an extensive role for local plans in transport terms, but there is a risk of disconnect between planning and transport, and we think that more is needed to provide the link between the Local Plan and Bristol's current transport strategies and plans. (Unfortunately, this is made more difficult because the recently published transport documents - eg the Bristol Transport Strategy and Joint Local Transport Plan - do not yet set out a clear plan. They set out a list of initiatives but not a clear plan.)

In particular, the transport policies should address the impact of the increased population in the growth areas. Traffic volumes at peak times already exceed the capacity of Bristol's roads, and the increased population will add to the traffic volumes and perpetuate the gridlock, unless action is taken. We believe this will need to include demand management measures such as a congestion charge, a charging Clean Air Zone, a Workplace Parking Levy, parking controls, and physical measures to curb certain access and movements.

The Local Plan mentions the need to improve connectivity into some of the areas of rapid development, such as St Philip's Marsh and Lockleaze, by making statements like "Development will be supported by transport improvements". But there is no cross-reference to transport plans to back this up.

By way of comparison, we note the [London Plan](#) contains a substantial section of transport policies, which could provide pointers for what should be in the Bristol Local Plan:

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T7 Deliveries, servicing and construction

Policy T8 Aviation

Policy T9 Funding transport infrastructure through planning

We would draw out in particular from these policies:

- the policies would seem to provide a strong steer to developers to make provision for sustainable transport modes
- in policy T2 there is a strong vision of sustainable place-making
- policy T9 is relevant for raising funds for Bristol's proposed mass transit routes

2.4 Section 13: Climate change – the section should reflect the climate emergency

We think that the section on climate change should reflect the recent acknowledgment of a climate *emergency*, and the Council's adoption of a 2030 zero emissions target. We recognise that the Local Plan covers the emissions impact of new developments only, but this document needs to set the right tone.

2.5 References to other policies

We are surprised that the Local Plan does not cross-refer to more of Bristol's planning documents on specific topics. We suggest references are added to eg the Bedminster Green Place-Making Framework, the City Centre Framework, the Parking Strategy, the Transport Development Management guide.

2.6 Language – “encourage”

We think that the use of the word "encourage" should be reviewed. In many cases, it represents an aspiration of the Council for which the Council is powerless to take action to achieve the desired outcome. Where this is the case, a better approach to policy wording might be to say “development proposals which do X will be supported”. In the examples where the council *can* take action to achieve the aspiration, it would be helpful to describe what that action is - both for the Plan's audience in understanding the policy, and also for the Council to be clear on what its policy is.

3 Comments section by section

Section 4: Development Strategy

1) Is there enough to ensure masterplanning and co-ordination between developers in major growth areas ?

We support spatial frameworks for all areas of growth. We recognise that the Council is unable to resource the production of spatial frameworks for *all* the areas, and it is therefore important that the Local Plan gives clear guidance to developers to ensure that the right framework is produced at the right time.

The following wording (which is used in several places) could be strengthened by changing it from:

"Development proposals will be expected to demonstrate that opportunities have been sought to progress more comprehensive or co-ordinated forms of development with other sites in the locality"

to:

“Major developments will be plan led. Planning Performance Agreements between the Council and the developer of a major site will require the preparation of a planning framework for the development area to be produced before a planning application will be considered. The framework should consider the impact of the development outside the boundary of the development, and possible coordination with nearby developments. Planning frameworks will be prepared on the joint instructions of the Council and the developer and funded by the developer. Frameworks must be prepared in a collaborative way with local communities and stakeholders. The definition of a major site for this purpose and the required content of a framework document are specified in section 0.4 of the Urban Living Supplementary Planning Document.”

2) Our comments on particular growth areas

The Local Plan document might usefully include a table like the one below listing for each growth area the existing framework(s) and the plan for future frameworks. The right-hand comment includes our comments on the draft proposals.

Policy	Area	Draft document - what framework – existing or future	Suggested additions or changes
	Central		
DS1	City centre	Old Market NDP	refer to City Centre Framework and add to map refer to Redcliffe plan and add to map add more detailed framework for High Street/Wine Street, and Stokes Croft (CCF and BCAP are not enough)
DS2	Temple Quarter) “a masterplan”)	refer to Temple Quarter spatial framework (it may be retained alongside the masterplan ?)
DS3	St Philip’s Marsh)	
DS4	Western Harbour	onus on developers	we suggest that the Council produces a framework
DS5	Frome Gateway	“proposed Spatial Framework”	we welcome the Council’s decision to prepare a framework
	East		
DS6	Lawrence Hill	onus on developers	designated for tall buildings, so at greater risk of planning failure we suggest that the Council produces a framework for the area of and around the Lawrence Hill roundabout.
DS7	Central Fishponds	onus on developers	designated for tall buildings, so at greater risk of planning failure
	South		
DS8	Central Bedminster	onus on developers	refer to adopted Bedminster Green spatial framework add re Bedminster Green 2
DS9	Brislington	onus on developers	-
-	Hengrove + Knowle West	existing NDP and framework	-
DS10	Changes to green belt	-	-
DS11	Dev alloc – SW Bristol	-	-
DS12	New - Bath Rd Brislington	-	add onus on developers
	North		
DS13	Lockleaze	onus on developers	public transport services need to be developed to make the area more sustainable.
DS14	Central Southmead	onus on developers	refer to existing plan for Glencoyne Square
-	Lawrence Weston	existing NDP	-

Western Harbour.

We do not think tall buildings are acceptable in Western Harbour. In particular, tall buildings in front of a view of the gorge are not appropriate. The sentence “Proposals will have regard to the area’s important heritage assets and respond appropriately to key views and landmarks set out in the City Docks Conservation Area Character Appraisal.”

should be amended to explicitly rule out tall buildings, saying something like:

“Proposals will have regard to the area’s important heritage assets and respond appropriately to key views and landmarks set out in the City Docks Conservation Area Character Appraisal. Building heights will be no higher than as at Wapping Wharf and will in any case be subservient to the tobacco bond houses.”

Henbury

The Society believes that further consideration should be given to including Henbury as a growth area. It will be joined to the rail network when the Henbury spur is implemented and has reasonable bus services. Growth of population in Henbury could also improve the business case for completing the Henbury Loop by extending passenger services to the Severn Beach line which would make employment opportunities in the Avonmouth area much more accessible to local residents. It would also improve public transport options more generally in North Bristol. Whilst there might not be major residential development opportunities available, it is the Society's belief that there is scope for increasing the density of existing residential areas which should be encouraged. Population growth would encourage the retention and improvement of retail and other services in Henbury.

Section 5: Infrastructure and Developer Contributions

No comments.

Section 6: Urban Living

We support policies:

- UL1: Effective and efficient use of land (including Diagram 6.1 showing indicative areas for the density of new development) and
- UL2: Residential densities (including Table 6.2 showing minimum net densities by area).

These policies are solely about density measures. They refer to the Urban Living Supplementary Planning Document, which takes a more rounded view of high-density design, bringing in liveability considerations.

The only reference to liveability in this section of the Local Plan document is the paragraphs:

“6.2 Urban living optimises densities, balancing the efficient and effective use of land with ~~aspirations for~~ (our suggested deletion) making quality places to live, successful placemaking, and a positive response to context.

6.3 The council has prepared a supplementary planning document on urban living that provides further guidance on making successful places at higher densities.”

We think the Local Plan could strengthen the crucial point that optimisation is a balance between density and liveability, by including a reference to liveability in the policies themselves. Section 14 contains Policy DC1: Liveability in residential development including space standards, which aims to do this. It would fit much better in this section.

Section 7: Housing

Policy H6: Homes in multiple occupation and other shared housing

The list of impacts that could lead to planning refusal could also include overlooking and loss of privacy from first-floor living accommodation.

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

We welcome the aim of this policy, seeking to avoid over-concentration of student housing in any one area, and to ensure that a reasonable proportion is built on the university sites.

We repeat the comment we made in the 2018 consultation that student development must be adaptable to other uses. The policy could include the following:

“We expect bespoke student development to be adaptable to other uses should there be a drop in demand for student accommodation. The spacing of the structural walls and windows should be sited to enable the purpose-built student housing to be converted into residential apartments in a manner that minimises modification to the external envelope.”

Section 8: Economy

Draft Policy E2: Employment land strategy

Draft Policy E4: Industry and Distribution Areas

Draft Policy E7: New workspace within mixed use development

These three policies together describe the policy for developments of old workspace areas and development of new workspace. None of these policies seem to cover the situation where a start-up wishes to use a local property, say a disused factory or forecourt or other building with a different use type, which is not in one of the designated Industry and Distribution Areas. Given the change in employment patterns, and the trend to smaller workspaces, we suggest that the policies should be flexible enough to allow for such a situation.

Section 9: Shopping Services and the Evening Economy

No change in policy is planned for shopping areas. It is claimed that the existing policies "provide a very flexible approach to supporting centres whilst accommodating the changing face of the high street". This seems surprising given the rapid change in the retail market.

We suggest a change in a paragraph 9.4 from:

“9.4 The retail industry has experienced significant change recently with store closures and changing formats and patterns of retailing. The policies listed below provide a very flexible approach to supporting centres whilst accommodating the changing face of the high street. By focusing the changing approach to town centre uses within the hierarchy and network, they support the continued strength of the Bristol’s city, town, district and local centres as places to visit, interact and serve the needs of the city’s residents.”

to

“9.4 The 2006 retail study was last updated in 2010 (in relation to south Bristol). The disruption of the retail market by on-line shopping has radically reduced the demand for retail space. Unoccupied shops are evidence of an oversupply of retail space. The policies listed below provide a very flexible approach to supporting centres whilst accommodating the changing face of the high street. By focusing the changing approach to town centre uses within the hierarchy and network, they support the continued strength of the Bristol’s city, town, district and local centres as places to visit, interact and serve the needs of the city’s residents. The Council is prepared to consider alternative uses for retail frontages in all shopping areas if the developer establishes that there is no market demand for retail use and the new use of the retail unit provides an activity which draws people to the shopping area.”

This could be developed into a formal policy, which might give guidance on which alternative uses would be acceptable.

The policy on student housing refers to the provision of student accommodation in Broadmead. This is but one possible change of use.

Section 10: Green Infrastructure and Open Space

Policy GI1: Local Green Space

Draft Policy GI2: Reserved Open Space

The terminology 'local green spaces' and 'reserved open spaces' is confusing and we suspect not well understood. 'Local green spaces' carry permanent protection, but the protection offered for 'reserved open spaces' might, despite the use of the word 'reserved', be reviewed at a future date. Perhaps the term 'currently reserved open spaces' would be clearer ?

The assessment of spaces designated as local green space is transparent in the document "Bristol Local Plan Review: New Protection for Open Space", but it is not transparent for spaces designated as 'reserved open space' that are deemed not to meet the criteria of a local green space'. This is unfortunate because there are bound to be a number of spaces which the local community feel meet the designated 5 criteria to justify designation as a 'local green space', but there is no way of knowing why the space has not been so designated.

We suspect that the assessment is not as simple as implied by the colour-coded five-column table for those areas designated as a 'local open space'. For example, it is said that a space can be designated as a 'local open space' even if it only meets one of the criteria, but there must be plenty of 'reserved open spaces' that meet one of the criteria.

Our comments on some individual spaces are:

- the Railway Path: this would seem to meet the criteria for a local green space.
- Stoke Lodge: this would seem to meet the criteria for a local green space.
- Wesley College and associated land: the recent Planning Inspector reports refer to "a heritage asset that is culturally significant". Although there is currently no public access, if the ownership of land changes, the land at Wesley College could form part of a green walking route from the huge residential expansion at and near Filton airfield to the Blaise estate. These points would seem to justify designation as at least a reserved open space
- Western harbour: we understand that this has not been designated because the highway layout will change, but some of it would be expected to be designated as Local Green Space when the plans for the area are settled. We think this point could be made clear in the document. The riverside open spaces in particular exhibit all of the requisite criteria for a Local Green Space and are of considerable local significance to the existing and expanding populations of Hotwells Southville and Bedminster, and there is little other Local Green Space in the vicinity.

Section 11: Transport

See our comments at section 2.3 above.

The retained Policy DM23: Transport Development Management presumably needs to be supplemented by a reference to the Transport Development Management guide to developers.

Section 12: Community Facilities

No comments.

Section 13: Climate Change and Sustainability

See our comments at section 2.4 above.

Otherwise, no comments

Section 14: Design and Conservation

Policy DC1: Liveability in residential development including space standards.

This policy would fit much better in the section on Urban Living.

Policy DC2: Tall buildings

This policy would fit much better in the section on Urban Living.

The policy applies “in the locations for more intensive forms of development set out in Draft Policy UL1”. Policy UL1 says “This includes the areas of growth and regeneration set out in the Development Strategy (Draft Policies DS1-DS14).” That implies tall buildings are acceptable in *all* the growth areas DS1 to DS14, which is not the case. This is a drafting error that needs correcting.

There are other internal inconsistencies in the consultation document’s description of which areas are acceptable for tall buildings – see table below re policies DS2/3/4/5. These need resolving. Once these anomalies have been corrected, it would be useful to show such a summary table in the Local Plan.

We do not think tall buildings are acceptable in Western Harbour. See our comments on policy DS4.

Policy	Area	Tall buildings allowed in consultation draft ?
	Central	
DS1	City centre	Yes (in policy UL1)
DS2	Temple Quarter	Yes (covered by ‘city centre’ in policy DS1, in policy UL1 but not DS2)
DS3	St Philip’s Marsh	Yes (covered by ‘city centre’ in policy DS1, in policy UL1, in policy DS2 but not in DS3)
DS4	Western Harbour	Yes (covered by ‘city centre’ in policies DS1 and UL1 but not in DS4)
DS5	Frome Gateway	Yes (covered by ‘city centre’ in policies DS1 and UL1 but not in DS5)
	East	
DS6	Lawrence Hill	Yes

DS7	Central Fishponds	Yes
	South	
DS8	Central Bedminster	Yes
DS9	Brislington	
-	Hengrove + Knowle W	
DS10	Changes to green belt	
DS11	Dev alloc – SW Bristol	
DS12	New - Bath Rd Brislington	
	North	
DS13	Lockleaze	
DS14	Central Southmead	
-	Lawrence Weston	

Policy DC3: Local Character and Distinctiveness

No comments.

We suggest that in the Development Management policies there be included a policy that the Council will expect developers to include the use of anti-graffiti materials at vulnerable levels of all new buildings.

Section 15: Health and Wellbeing

Policy HW2: Air Quality

We welcome this policy.

Section 16: Utilities and Minerals

No comments.

Section 17: Draft Development Allocations

No comments.

Section 18: Retained policies

No comments

Site Allocations (separate document)

We support Avonmouth planning group's request that the PIWA designation be removed from the small linear area which is bounded by the railway line and Portview Road, running from Portway to just before the Avonmouth Tavern. This is a good site for residential development, and the lorry deliveries to the current business sites outside normal opening hours have a significant impact on local residents. Residential development in Avonmouth could facilitate community development and help the village become more self-sufficient. The area could be treated similarly to a number of sites which are currently in use where the wording is:

"The site would be considered appropriate for residential uses, if no longer required by current landowners / users in its current use."