



an independent force for a **better Bristol**

Response to government consultation “Strengthening planning policy for brownfield development”

The Society

We are an independent, voluntary organisation that exists to improve Bristol’s built environment and celebrate its heritage. Our membership is drawn from the local area and we have over 600 members. Our members have lived experience of Bristol and care passionately about the city’s future and how it will be shaped by the planning process. We represent an important and informed body of opinion. Through our working groups, we seek to influence the development of major sites in the city and improve transport and placemaking. We do this through active engagement on specific development proposals, and with plan and policy-making in the city. This means we are very familiar with how national planning policy filters through to decisions on development proposals and, as customers of the outcomes, are well-positioned to judge the effectiveness of current process and policy.

Our concerns

Bristol Civic Society has strong concerns about the proposals in the consultation about strengthening planning policy for brownfield development. The proposed policy tips the balance too far in favour of housing development on brownfield sites, diluting important considerations that are embodied in the NPPF and Local Plans, without good reason. This approach will store up problems for the future, by encouraging development of inappropriate sites and below-standard flats. There are better ways of tackling the housing crisis. In more detail ...

We agree with the general principle of making good use of existing land resources, particularly land that has been previously developed. This means we agree that brownfield and other under-utilised urban sites should be prioritised for housing development, but only to the extent sites are suitable and brought forward as part of informed placemaking. The proposals set out in section 3 of the consultation seem to ignore current and likely capacity in social, physical and environmental infrastructure, the needs of communities in the round including for jobs, family housing and access to open space and nature; and, the fact that many brownfield sites are high in biodiversity value, or heavily polluted or are in locations suffering from poor air quality, or a combination of all these.

We therefore strongly oppose the suggestion in Q.7. to change the Housing Delivery Test threshold for the application of the Presumption in Favour of Sustainable Development on previously developed land, and by implication the proposals relating to its application to the cities subject to the arbitrary urban uplift.

We also have significant concerns about the suggestions in section 2. Ministers appear, in effect, to be devising a two-tier approach to placemaking. We fear that the character, quality of place-making and health of communities in our towns and cities will fall victim to this. Take the proposal to take a flexible approach in applying planning policies or guidance relating to the internal layout of development. This would mean there would be little to no control of space standards, room orientation including single aspect north facing flats, no consideration of natural ventilation and overheating in the summer or many other important aspects of healthy living. We see proposals in Bristol where people's living rooms would overlook service yards operating 24/7, or other sources of disturbance and disruption to sleep. And how with these proposals would the Agent of Change principle be applied?

There is already sufficient (and perhaps too much) unconditional national policy encouragement to delivering as many homes as possible on brownfield sites, exacerbated in those places subject to the uplift. What is likely to ensue from the application of these latest proposals is over-development and people condemned to live in unhealthy homes. Our responses to Q.1 and Q.2 are therefore a clear 'no'.

That you are even asking Q.3 ("If we were to make the change set out in question 2,what else should we consider?") underlines our concerns that the government is devising a two tier planning system that will undermine healthy placemaking in our towns and cities. Our clear answer to Q.3. is no.