

## Bristol Civic Society

### Response to NPPF consultation

BCS Response doc 04 - submission

#### 1. Introduction

The purpose of this document is to set out Bristol Civic Society's response to the consultation on the proposed new National Planning Policy Framework ("NPPF consultation December 2025").

Bristol Civic Society will also submit answers online to some of the 225 consultation questions on the consultation website. In our answers online and what we say below we have chosen to concentrate on specific chapters which in our view are the priorities for Bristol:

- Plan-making policies – Ch.2
- Decision-making policies – Ch.3
- Achieving sustainable development – Ch. 4
- Effective use of land - Ch.12
- Achieving well-designed places - Ch.14
- Transport – Ch.15
- Natural environment – Ch.19
- Historic environment – Ch.20

#### 2. The Society

Bristol Civic Society is 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 with experience of living in Bristol. We care about our city's future and how it will be shaped by the planning process. We claim to represent an informed, balanced and engaged body of opinion. Through our working groups we influence the development of major sites in the city and we improve transport and placemaking. We do this through active engagement on specific development proposals and with plans and policy-making in Bristol. We are thus familiar with how national planning policy filters through to decisions on development proposals and, as critics and customers of the outcomes, we are well-positioned to judge the effectiveness of planning policy and process.

#### 3. Some general points

It is important to see our city in context. With a population of more than 500,000 Bristol is the largest city by far in the South of England after London and one of the fastest-growing cities in the country, with projections of a 10% increase 2022 - 2032 driven largely by international migration. Bristol is the major conurbation within the West of England Combined Authority (WECA) area. WECA is responsible for regional development across Bath & North East Somerset, Bristol, and South Gloucestershire (and possibly also North Somerset in future) and is thus responsible for local Spatial Development Strategies (SDSs) which will affect Bristol.

We give here our views in summary of the proposals in the draft NPPF:

- We support the principle of **streamlining policy** ...

- ... although we have concerns about **loss of local autonomy in policy-setting**
- The greater weight given to **presumed development** and to **density** are understandable but somewhat concerning
- Some improvements are welcome; specifically on **development viability, transport and design**
- We are concerned about the **future of community engagement**

#### 4. Our response

Here we give our responses to selected chapters in the consultation as noted above, based on what Bristol Civic Society sees as priorities for the future of our city and all who live in it.

### **CHAPTER 2: PLAN-MAKING POLICIES**

#### **PM1 Spatial development strategies**

Q6: *Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?*

Q6: Partially agree.

Q6a: *Please provide your reasons, particularly if you disagree*

We are unsure how it will work in practice in the context of having to draft a Local Plan within 30 months before a Spatial Development Strategy has allocated housing supply numbers across local authorities; especially as Bristol City Council finds it difficult to meet its housing targets within the boundaries of its area.

#### **PM2 Local Plans**

Q9. *Do you agree with the role, purpose and content of local plans set out in policy PM2?*

Q9. Partially agree

Q9a *Please provide your reasons, particularly if you disagree*

We support the slimming down of Local Plans by reducing duplication, but in some cases this will reduce the scope for different policy standards to be applied locally even if they have local democratic support.

30 months seems unrealistic, especially as it includes the Examination process.

#### **PM4: Supplementary Plans**

[no consultation question asked]

The Society has no issue with the principle of Supplementary Plans. However Bristol City Council already has a large number of Supplementary Planning Documents. The draft NPPF offers no indication of whether these will remain and become Supplementary Plans or will have to be updated or be deleted.

The NPPF mentions 'Authority Wide Design Codes' as one topic for future Supplementary Plans, as well as codes for sites. Bristol City Council will be producing an authority-wide Design **Guide** but not a **Code**, leaving that level of detail to neighbourhood level work. No mention is made of the city's area level **Character Assessments** and Codes which at present only acquire status as material considerations. They are however a key step between area-wide guides and codes and site-specific codes and they are now produced

regularly as parts of made Neighbourhood Plans, so urgent guidance is needed about the future status of neighbourhood assessments and codes.

### **PM5: Neighbourhood Plans**

[no consultation question asked]

The NPPF states that Neighbourhood Plans '*should not promote less development than provided for in other parts of the development plan for the area*'. Housing targets are not usually set in Local Plans for un-parished urban neighbourhoods; that is certainly the case in Bristol. Guidance is needed for how urban neighbourhood targets can be established.

### **PM13: Setting standards**

*Q 18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?*

Partly agree.

*Q 18 a) Please provide your reasons, particularly if you disagree.*

It should be made clear that the Nationally Described Space Standard is applicable to ALL residential development proposals. This could be done by amending 1. Quantitative standards set through development plan policies ... to 1. Quantitative standards set **locally** through development plan policies ...

## **CHAPTER 3: DECISION-MAKING POLICIES**

### **DM1: Preparing Development Proposals**

*Q21) Do you agree with the principles set out in policy DM1?*

Partly agree.

*Q21a) Please provide your reasons, particularly if you disagree.*

The policy advises that proposals for major development should *be informed by early engagement with neighbours* and the local community and seeks to identify and *resolve key planning matters prior to the submission of a planning application*.

Pre-application engagement with local community groups is essential to achieve the aims set out in the policy. Planning authorities must insist that applicants undertake community consultation during the pre-application stage and include a description of how their proposals have incorporated issues raised in their planning statement.

The Society agrees in principle with the proposals for ensuring community engagement. We do, however, have some queries about deliverability.

1. The draft states that '*proposals for major development should .... be informed by early engagement with neighbours and the local community (etc.)*'. The inclusion of the word 'should' may be a small step up from previous NPPFs which used the word 'encourage' but it is completely unclear how this could be in any way enforced so that it becomes standard practice. Applicants can, and will, simply ignore it.
2. it then states that '*pre-application engagement may also be required where proposals raise complex planning matters, such as the potential effect on heritage assets*'. If engagement is 'required' then this would mean that applications could be considered

incomplete if not accompanied (as with Design and Access Statements) with a report of the engagement undertaken. This would surely require appropriate changes to regulations because any requirement cannot be imposed retrospectively once an application is received.

3. The use of 'require' is also unclear given the probable lack of any legally defensible definition of a 'complex site'. It is uncertain how that could be defined in any necessary regulations. Nor is it clear who would make the decision about which sites are 'complex'. It has been suggested that this could apply to the majority of sites in Bristol.
4. As proposed, applicants undertaking engagement would have to show in their report *'the extent to which the proposals have changed in response to this engagement'*, including why changes could not be made in response to clear community preferences. If that is the case then the same should also apply to officer reports, requiring them to also explain why, again, changes could not be made in response to clear community preferences.

## **Chapter 4: ACHIEVING SUSTAINABLE DEVELOPMENT**

### **S4: Principle of development within settlements**

*Q37: Do you agree to the proposed approach to development within settlements?*

Partially disagree.

*Q37a)* It is not clear how this policy is to be weighed against those elsewhere, including in the heritage chapter (Chapter 20) and this policy seems to undermine the plan-led system. Policy S4 prioritises speed and growth over quality and context, risking the undermining of plan-led development and good planning principles such as place-making, local distinctiveness and sustainable design.

## **CHAPTER 12: EFFECTIVE USE OF LAND**

### **L1: Planning for an Effective Use of Land**

*Q114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?*

Partly agree.

*Q115) If not, what further guidance is needed?*

We agree with the intention of this policy, but we do have the following comments:

Policy L1.1.a.i - not necessary to include the latter half 'such as.... schemes' as this is covered in decision-making policy L2.1.b and maybe cross-referred thereto.

Policy L1.1.a.ii - not necessary to include the latter half 'such as....curtilages' as this is covered in decision-making policy L2.1.d. and maybe cross-referred thereto

### **Policy L2: Making Effective Use of Land**

116) *Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?*

Partly disagree

a) *Please provide your reasons, particularly if you disagree.*

There is no explanation of what policy L2.2 *A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is an exceptional justification.* is trying to achieve or what it is for; is it necessary? should it be removed?

The aspirations set out in policy L2.3 seem to be adequately covered by various parts of policy L2.1; is it necessary? should it be removed?

117) *Do you agree policy L2 identifies appropriate typologies of development to support intensification?*

Partly agree

a) *If not, what typologies should be added or removed and why?*

The typology set out in policy L2.1.b.iii is confusing – see response to question 120.

118) *Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?*

Partly agree

a) *Please provide your reasons, particularly if you disagree.*

There is no provision in this policy to positively protect the character of conservation areas. An exception should be added to policy L2.1.d.

Policy L2.1.d.ii should include in acceptable living standards for residents 'provision of internal space in accordance with the Nationally Described Space Standard'.

Q.119) *Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions.*

Partly disagree

Q119 a) *Please provide your reasons, particularly if you disagree.*

There is no provision in this policy to positively protect the character of conservation areas, an exception should be added to policy L2.1.d.

Q.120) *Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?*

Partly disagree.

Q120a) *Please provide your reasons, particularly if you disagree.*

Policy L2.1.d.iii is confusing; does it mean that within any residential curtilage site 50% of the site should remain as open space and not be built on or should there be 50% of the site left as open space after extending the footprint of existing building? Many existing residential curtilages have less than 50% open space and any development thereon would not be possible within the parameter set by this policy. Is this the intention? If so, it needs to be clearly stated as such.

### **Policy L3: Achieving Appropriate Densities**

Q.121) *Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?*

partly agree.

121 a) *If not, please explain how guidance could be clearer?*

There should be stated maximum densities as well as minimum densities.

122) Do you agree with the minimum density requirements set out within policy L3?

partly disagree

Q122 a) Please provide your reasons, particularly if you disagree.

These minimum density figures in L 3.3 might be appropriate for development near railway stations in rural areas but should be more ambitious in some urban areas especially in city centres. But only if service frequency is high, and only in areas which the development plan identifies as suitable for growth and regeneration, and certainly not in Conservation Areas.

A more extensive range should be included. In Bristol the draft Local Plan suggests the following: 200 units/ha in a city centre setting; 100-120 units/ha in an urban setting; 50-60 units/ha in an outer urban setting. The lower and higher figures for urban and inner urban settings relate to proximity to bus routes i.e. within 'reasonable walking distance', a term used in the draft NPPF, but with no definition of what is 'reasonable'. A definition of 'reasonable walking distance', e.g. 5 minutes/400 metres, needs to be included in the NPPF.

b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence

Policies HO5 and HO12 seem to adequately cover provision of sites for Gypsies and Travellers and other groups with protected characteristics. If a suitable site for Gypsies and Travellers exists or is proposed close to a station, then it should remain as so and be safeguarded as such in Local Plans unless a suitable and acceptable alternative site is identified.

Q.123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?

Partly disagree.

a) Please provide your reasons, particularly if you disagree.

While dwellings per hectare is a well-used and appropriate metric for setting minimum density requirements, and the definition of net developable area in the draft NPPF is widely understood, there is no provision for adjusting the density to allow for different forms of residential accommodation, e.g. students and co-living, or for mixed use developments on specific sites.

Bed spaces per hectare gives a much better indication of the intensity of development and the likely numbers of occupants and includes student and co-living schemes.

Bristol City Council's Urban Living SPD advocates an approach to measuring density in mixed use schemes based on a methodology developed by architects Maccreanor Lavington to inform the London Local Plan. The method takes into account the impact of vertically stacked mixed use development (i.e. where housing is on top of non-residential use) by reducing the size of the site area by an amount that is equivalent to the proportion of total non-residential floorspace. The remaining site area is used to calculate net residential density.

The use of plot ratio (i.e. gross internal floor area divided by net developable site area) gives a good indication of the quantum of development that can be accommodated on a specific site.

These alternative approaches should be considered for incorporation into the NPPF.

Q.124) Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we're using for the number of Travel to Work Areas and service frequency appropriate for defining a 'well connected' station?

Partly disagree.

Q124 a) Please provide your reasons and preferred alternatives.

The quoted frequency of two trains/trams per hour in any one direction is too little. The frequency needs to be at least doubled. Look at what you get abroad in European cities! We welcome the proposals as far as they go and have no comments on the detail. We would like to see a commitment to a more radical review in due course.

*Q.125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally?*

Yes

*a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?*

Q125 a) Within reasonable walking distance of a bus stop which has a service frequency throughout the day of two buses or more per hour in any one direction. A definition of 'reasonable walking distance', e.g. 5 minutes/400 metres, needs to be included in the NPPF.

*Q126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?*

Yes

*Q127) If so, what should that range be, and which locations should it apply to?*

Q127a) 180dph minimum for main city centre stations, 120dph minimum for suburban stations and 60dph minimum for rural stations restricted to within reasonable walking distance. A definition of 'reasonable walking distance', e.g. 5 minutes/400 metres, needs to be included in the NPPF.

#### **Policy L4: Residential Extensions**

*Q128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?*

Partly agree.

*Q129) Please provide your reasons, particularly if you disagree.*

Policy L4.1.b should include in acceptable living standards 'provision of internal space in accordance with the Nationally Described Space Standard'.

### **CHAPTER 14: ACHIEVING WELL DESIGNED PLACES**

#### **Policy DP1: A Strategy for Design**

*Q.146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?*

Partly agree.

*Q146a) Please provide your reasons, particularly if you disagree.*

The design process must include community consultation at the stage of inception and as part of any design review. The policy should be amended to include community consultation. The planning authority should be tasked with maintaining a register of community groups that should be consulted and inform applicants accordingly.

DP1.1b:

- add 'areas of change or townscape sensitivity' after 'such as for significant site allocations and areas of change'
- add to the list of examples where design guides etc are needed: 'areas within or close to designated conservation areas'.

#### **Policy DP2: Design Guides, Design Codes and Masterplans**

*Q.147) Do you agree with the approach to design tools set out in policy DP2?*

Partly agree.

*Q147a) Please provide your reasons, particularly if you disagree.*

Again, as in the answer to question 146, local community consultation should be included in the wording to policy DP2.1.d.

### **Policy DP3: Key Principles for Well-Designed Places**

*Q148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?*

Partly agree.

*Q148a) Please provide your reasons, particularly if you disagree.*

- DP3.1: we support the seven features in that are used to define “well-designed” places.
- DP3.2: we support the strong statement that “Development proposals that are not well designed should be refused, ...”. But experience suggests that housing shortfalls often override this. An explicit statement that design standards apply always and to all development – not as a discretionary extra – would finally resolve this.
- DP3.2: delete ‘set out in the development plan.’ A masterplan adopted outside the development plan counts as a material consideration.
- Policy DP3.4 is surely not necessary as the assessment of what is ‘outstanding’ or ‘innovative’ is adequately covered in DP3.1.

The Society generally supports the consolidation of the National Design Guide and the National Model Design Code into one single guidance document. However, as above (comments on PM4), and in part because Bristol City Council will be preparing an area-wide Guide rather than a Code, our city is dependent for further detail on neighbourhood level Character Assessments and Design Statements/Guides and on input from neighbourhood communities (and our Society) on proposals for individual sites. The scope for these is not currently mentioned in the draft NPPF. It should be. (Further comments on this will be made in our response to the consultation on the consolidated guidance.)

### **Policy DP4: The Design Process**

*Q149) Do you agree with the proposed approach to using design review and other design processes in policy DP4?*

Partly agree.

*Q149a) If not, what else would help secure better design and placemaking outcomes?*

While the intentions of policy DP4 are fine there are two further points that need to be added:

1. Community groups must be included in the review process.
2. Where applicants/authors of permitted schemes change, any alterations to the permitted scheme proposed by the new applicants/authors should be referred to the original applicants/authors for review/comments. We are aware of examples in Bristol where a change in applicants/authors has resulted in a marked diminution of the quality of the development.

## **CHAPTER 15: TRANSPORT**

### **TR1: Vision-led approach to planning for transport**

*Q150: Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?*

Strongly agree

### **TR2: Local parking standards.**

*Q151: Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?*

Partly agree

Re TR2.2 *Maximum standards for car parking should be set to support sustainable transport and optimise density.* Easy enough to leave out purpose-built student accommodation (PBSA), which is growing rapidly in Bristol, and some intensive grad-rentals. But families with both parents working frequently need two vehicles to take children to school and for work and leisure. Brothers and sisters do not always go to the same school.

Bristol is seeing inner-city “blue collar” work sites being replaced by residential developments. This results in significant commuting OUT of the city centre.

#### **TR4: Street design, access and parking.**

*Q153: Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?*

Partly agree

This provision seems to be aimed at people say 8-40, fit and single in employment who can pay for trains and taxis. For many people these are not an option.

Clauses a) to e) are laudable. They include deliveries but do not mention recycling (which may be frequent in the case of high density developments).

Commuting does not necessarily mean a 9-to-5 workday. Commuting patterns are more varied.

Doesn't appear to anticipate all cars being electric. Electric cars need safe places to park and recharge.

#### **TR6: Assessing transport impacts**

*Q155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?*

Partly disagree

*Q155a) Please provide your reasons, particularly if you disagree.*

This is more obvious with say a secondary school than purpose-built student accommodation (PBSA).

### **CHAPTER 19: NATURAL ENVIRONMENT**

#### **N1: Identifying environmental opportunities and safeguards**

*Q179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?*

Partly agree.

a) Please provide your reasons, particularly if you disagree.

We would like a requirement that particularly in urban environments biodiversity and recreation should be considered together. In Bristol measures to increase biodiversity have significantly reduced recreational opportunities. The biodiversity net gain requirements have had some perverse effects and we would like more radical reform than is proposed here.

*Q.180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?*

This is for the developers to offer, not for planning authorities to require.

## **N2: Improving the natural environment**

*Q.181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?*

Partly agree.

Q181a) Please provide your reasons, particularly if you disagree.

We would like recreation given more emphasis in 1d Conserve and enhance existing natural features of visual, historic or nature conservation value.

## **N4: Protected Landscapes**

*Q.182 Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?*

Partly agree.

Q182a) Please provide your reasons, including how policy can be improved to ensure compliance.

Bristol is well placed for access to many protected landscapes. They add significantly to our quality of life. The guidance seems reasonably clear.

## **N6: Areas of particular importance for biodiversity**

*Q183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?*

Partly agree.

Q183a) Please provide your reasons, particularly if you disagree.

The guidance seems clear, though there is always scope for disagreement about the meaning of adjectives. We do not agree with the principle of financial compensation for damaging these landscapes.

*Q184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?*

Q184a) These plans need to give considerable weight to the recreational value of what is delivered.

## **CHAPTER 20: HISTORIC ENVIRONMENT**

### **HE2: Conservation Areas and World Heritage Sites**

*Q187: Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3?*

Strongly agree.

Q187a) Please provide your reasons, particularly if you disagree

Bristol is over 1000 years old and contains a multitude of key historical sites and landmarks. 33 Conservation Areas protect areas of the city having special architectural or historic character. This irreplaceable historic environment makes the city what it is.

We strongly support the maintenance and publication of a historic environment record, whether this is under the Levelling-up and Regeneration Act 2023 or any other statutory method.

## **HE5: Assessing effects on heritage assets**

*Q188: Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5?*

Partly agree

*Q188a) Please provide your reasons, particularly if you disagree*

We agree that development can improve heritage outcomes, provided development is done following a thorough assessment of the impact so that the full historical value and significance of the asset is retained. Anything less risks losing something that cannot be replaced.

## **HE6: Proposals affecting designated heritage assets**

*Q189: Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from “great weight” to “substantial weight”, and in particular the interactions between this and the statutory duties?*

Partially agree.

*Q189a) Please provide your reasons, particularly if you disagree*

We support the proposed changes that help bring underused heritage buildings back into use or improve energy efficiency, provided these changes are done with little harm to the historical significance of an irreplaceable heritage asset.

## **HE7-HE10: Decisions on non-designated heritage assets etc**

*Q190: Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10?*

Partially agree.

*Q190a) Please provide your reasons, particularly if you disagree*

Bristol has no world Heritage Sites but it has 33 Conservation Areas. We support clearer guidance separating decisions on World Heritage Sites from Conservation Area policy. The use of ‘preserve’ introduces a degree of perceived inconsistency in heritage policy. – The phrases ‘should be approved’ and ‘should be supported’ are both used in the draft NPPF. “Supported” is more positive.

Although the policy addresses the need for preservation, it does not address the opportunity for enhancement that is also an important aspect of the statutory responsibility of planning authorities in Conservation Areas. Without policy direction to pursue enhancement, the policy strikes an overly restrictive direction for development in Conservation Areas that is stuck between the narrow scope of preserve (conserve) or harm.

We welcome opportunities for new developments within the setting of heritage assets provided they preserve, enhance or better reveal their significance. However it is not always possible to assess whether an element of an asset contributes to its significance. Planning authorities must be very thoughtful when weighing up proposals in Conservation Areas.