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Bristol Civic Society Response to the Bristol Local Plan Modifications Report April 2026

General comments

Bristol Civic Society has carefully evaluated the Inspectors' letters and Bristol City Council's Modifications report. The Civic Society made representations to the Local Plan Inquiry alongside other parties. We said that the Local Plan does not respond to the growing and changing city, particularly in respect of housing and employment.

Whilst we note that some of our concerns were not addressed in the Modifications, we are pleased that the Inspectors asked Bristol City Council to start an immediate review of this plan, as required by the National Planning Framework (NPPF). We feel the City needs a new Local Plan that has a strong vision for a growing City, that works with the adjoining authorities and acknowledges the impact of growth in how the City should be developed. This vision would properly plan for housing growth, have an accurate and realistic assessment of student housing needs, resist the development of high-density housing such as 'co-living', and genuinely protect employment land for our growing city. This new plan should also build in realistic proposals and mechanisms to achieve affordable housing.

We are especially disappointed that, in agreeing the Bristol Local Plan Modifications with no cap on student housing numbers, or on co-living, with no target for affordable housing, and weak policies for protecting employment land, the Council risks letting the developers run amok in our city rather than setting a vision and working with developers to achieve this.

We have already seen this happen on key sites in Frome Gateway, St Philips and Princess Street, where Bristol's policies, regeneration frameworks and even Conservation Areas have been ignored, and student housing proposals up to 32 storeys tall have been approved, with scant opportunity given to listen to and take account of community views.

The Civic Society has made the point many times that Bristol needs an explicit Tall Building and Densification Policy that sets out an assessment of the views and heritage impact, allowing for the topography of the city. This should now include the new 'town centres' such as at Brabazon, Hicks Gate and Ashton Vale, indicating height at these hubs and prescribing medium-rise development to ensure the housing numbers are achieved. Other comparable and significant historic cities have tall building policies that set out the vision for development and growth which ensures modern, beautiful cities. For example, Edinburgh, Glasgow, Liverpool and Belfast. Paris has an absolute restriction on development above 37metres or 12 storeys. Bristol has often been a leader in planning policy and approach to sustainable development. It is time to stop, to rethink and plan a beautiful city again: tall buildings are not the solution.

Bristol Civic Society looks forward to working positively with Bristol City Council in developing a new Local Plan for Bristol. Bristol is a thriving modern city, with a great history to build on but it has massive pockets of deprivation where people live in overcrowded conditions with poor access to employment, open space and the community infrastructure they deserve. There is a great opportunity for Bristol to work with the adjoining authorities and the West of England Combined Authority on a shared growth and investment strategy.

Comments on policy wordings

Please see below some more specific detailed comments.

1 Policy DS3: St Philips Marsh: MM3.9

The amount of open space per person in central and inner Bristol is inadequate and will get worse on current plans, even without the further building proposed in this Local Plan. The Society strongly favours the creation of a large destination park in St Philip's Marsh: the proposed enhancement of Sparke Evans Park will not suffice, especially if it is to be mainly a nature reserve as recently proposed. There should be a space elsewhere for active recreation. We would also like clear targets for the creation of open space in this area, just as the modifications now provide for the number of new homes,

We would like the final bullet point on p.16 re-worded as shown in red below:

The retention, enhancement and creation of open space. This will include the creation of a large 'destination park' to serve the new developments and other parts of central and inner Bristol. Further new and enhanced open space will be provided in accordance with local plan policy GI A 'Open space for recreation' and will be secured from new development.

We would also like the last of the place principles on p.19 re-worded as follows:

Development will ensure the provision of appropriate green infrastructure and open space. This will ensure that there is at least 30 square metres per head of open space per person in the area as a whole and that no one is more than a ten minute walk from a green space where they can relax.

30 square metres per head can be justified as:

- the Natural England target
- what is already achieved for the city overall
- the importance of St Philip's Marsh for Bristol's inner areas as a whole. It is the only place where significantly more open space can be provided, in a destination park serving a wider area.

2 Policies DSx, UL1, UL2 and minimum densities

DSx policies have been changed to include minimum densities (dwellings per hectare) "in accordance with policy UL2 'Residential densities'", categorising growth areas as 'city centre' or 'inner urban'.

Policy UL2 Residential Densities sets out minimum densities by category of growth area as follows:

	General	More intensive
Bristol City Centre	-	200
Inner urban area	100	120
Outer urban area	50	60

The changes to DSx policies result in some inconsistencies with policy UL2, when taken together with *diagram 5.1: Indicative areas for the density of new development*. The table below shows the inconsistencies in bold.

	<u>Area category</u>		<u>Min density (dph)</u>	
	DSx	UL2	DSx	UL2
MM3.4 Policy DS1A City Centre	City centre	City centre	200	200
MM3.7 Policy DS2 Temple Quarter	City centre	City centre	200	200
MM3.9 Policy DS3 St Philips Marsh	City centre	City centre	200	200
MM3.11 Policy DS4 Western Harbour	Inner urban	City centre	120	200
MM3.13 Policy DS5 Frome Gateway	City centre	Inner urban	200	120
MM3.15 Policy DS6 Lawrence Hill	City centre	Inner urban	200	120
MM3.17 Policy DS7 Central Fishponds	-	Outer urban	100	60
MM3.19 Policy DS8 Central Bedminster	-	Inner urban	120	120
MM3.21 Policy DS9 Brislington	-	Outer urban	60*	60

* unless site constraints such as heritage indicate otherwise.

To make the Local Plan document consistent throughout, we suggest the following:

Changes to DSx policies:

- in DS5/6/7, the minimum densities should be changed to align with the table in UL2. This will align Frome Gateway and Lawrence Hill with Greater Bedminster, which is appropriate. And it will align Central Fishponds with Brislington, which again is appropriate
- the caveat 'unless site constraints such as heritage indicate otherwise' should be added to the proposed modified wording for all the DS areas.

Changes to UL1 explanatory text diagram 5.1: Indicative areas for the density of new development
- change the map to show Western Harbour – change the shading from *Bristol City Centre* to *Inner Urban (more intensive)*.

Changes to MMD.1, Appendix D Monitoring and Review

- change the references to *xxx dph in accordance with policy UL2 'Residential densities'*, to align with the other changes that we suggest.

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

Following the Inspectors' direction, the allocations of PBSA numbers of bed spaces have been removed from the Local Plan. Yet the explanatory text for policy 7 still includes paragraph 6.76, which refers to "... a need for some 8,800 additional bed spaces city-wide by 2040".

The figure of 8,800 only makes sense in the context of the total of completed bedspaces citywide of around 17,600, 8,200 bed spaces with planning permission, and 2,400 bed spaces pending a decision (all figures at April 2025). [Source: the Council's paper EXA 054]. Since then new applications have arisen with for example an additional 1000 bedspaces granted on two sites at a single Planning Committee meeting in April 2026.

The projected future demand number of 8,800 needs adjusting to take account of new applications since April 2025. Alternatively paragraph 6.76 should be deleted.

4 Policy GIA: Open space for recreation: MM9.11 and MM9.12

The Society is concerned by the greater emphasis on the circumstances in which the requirement to create more recreational space can be ignored. The quantity of open space for recreation in inner and central Bristol per head is inadequate already and this would make it worse. Further, quality improvements may not last. We would like the final paragraph of MM9.11 deleted. If this is

not done, it should at least be modified as shown in red:

In exceptional circumstances, where achieving the desired level of quantity of open space for recreation within the appropriate distance is not possible, significant and permanent quality improvements to nearby open spaces may be acceptable in addressing open space provision."

5 Policy GI2: Protected Open Space: MM9.16

We accept that the Local Green Space designation should be used very sparingly. Given the other protection afforded to green spaces, we are content that its use should not be further reviewed now. We would like planning officers to bear in mind whether this designation is applicable in their work going forward.

Comments of detail and typos

6 Policy GIA: Open space for recreation: MM9.12

The explanatory text in para 9.2.7 of MM9.12 says:

Accepted circumstances where it may not be possible to deliver the desired level of quantity of open space for recreation within the appropriate distance relate to limited land availability.

This is not a sentence. It would be clearer as:

This recognises that limited land availability may make it impossible to deliver the desired quantity of open space for recreation within the appropriate distance.

7 Policy GI2: Protected Open Space MM9.16

The reference in the first line of MM9.16 should revert to Reserved. The Policies Map does not identify Protected Open Space.

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

There are two references to *Having regard to the guidance set out in the Transport SPD*. But the new NPPF precludes SPDs?

9 Policy CHE1: Conservation and the historic environment

The wording includes:

3.2.14 In addition to these resources, the Council has produced Our Inherited City, a strategy for managing Bristol's heritage. This strategy sets out priorities for the city's historic environment with a focus on city and neighbourhood identities, consistent with the National Design Guide and National Model Design Code. The Council intends to update this strategy in 2025. Applicants should refer to the Our Inherited City Heritage Statement Guidance.

But 'Our Inherited City' has neither been published nor adopted.