

Bristol Civic Society response to Local Plan 2045 consultation September 2026

*draft v3 final 29 September
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Introduction

Bristol Civic Society welcomes the opportunity to comment at the start of the Local Plan 2045 process. The Scoping Consultation is a refreshingly new way of consulting on the Local Plan, genuinely asking open questions about what should be in the Local Plan.

This response follows the format of the online survey. To put the responses into context, it includes in italics selected wording from the Council's Scoping background document.

How to approach future local plan engagement

To hear from all the various communities, businesses and organisations across the entire city and all age groups, we would like to update and expand the way we engage with people in Bristol.

Below are some communication and engagement methods we have considered.

Q2. Please select those that you find most relevant to how you would like to be engaged with:

✓ The local plan mailing list (Email and post)

- Bristol Nights Newsletter*
- Business Newsletter*
- Social Media (LinkedIn, Instagram)*

✓ Information Sessions (online / in-person)

✓ Face to face engagement sessions

- Surveys*
- If other please provide further details:*

Q3. Have you experienced any barriers in engaging with us, and if so, can you tell us more?

It has not been possible recently to engage other than by written responses to consultations. This is in a sense a 'barrier'. It is also our impression that other groups/individuals face more barriers than us through not speaking the same language/not having the contacts or knowledge.

We appreciate the help of Neli Vaselivi last night at our discussion on this response.

For an organisation like ours, which is hugely interested in the future of our city, this limited engagement feels inadequate. Other organisations probably feel similarly. There should be scope for an ongoing forum or fora for the diverse range of interested parties to come together.

There are times when we would welcome the opportunity for face-to-face meetings to explain our point of view, to understand the Council's position, and to engage in a real discussion. With other Council consultations, other engagement formats are often provided – for instance stakeholder workshops for the most engaged stakeholder groups, or public drop-in events. It seems that the Council has decided that the capacity of the planning policy officer team does not allow that for a Local Plan consultation.

Could this be reviewed? Engagement events for other consultations are sometimes with the help of extra officer capacity provided by a specialist engagement team: perhaps this approach might be considered for Local Plan engagement?

There should also be scope for bringing members of the public together so they are more involved in the vision for the city – events of different types that inspire and engage. This is

perhaps a job that is wider than the Council's planning policy team. The recent [Local Government Association \(LGA\) review](#) of the Council recommended in the Action Plan 2026-27: "Develop a clear, confident core narrative and associated communications products for different audiences, which tell Bristol's story and the role that the Council plays in shaping the future of the city and wider region".

The government's requirement to deliver the new Local Plan within 30 months places a major constraint on achieving better engagement within the Local Plan timetable. This should not be used as a reason to make no improvements in engagement generally. Some things may not be possible with Council resources alone, and funding and partnership possibilities may have to be explored.

Some of our Members feel that our well-meant efforts to contribute in a positive way are sometimes sidelined.

The 'formality' and nature of planning policy is a barrier to most people. Few people engage with it, even though it's so important.

Q4. Do you have any suggestions on how the council can ensure that the engagement strategy is more accessible to, and inclusive of, different communities?
No.

[Questions 5-8 are not relevant to BCS.]

Proposed priorities for the Local Plan to 2045

9. Which of the following themes would you like to comment on? (Tick all that apply. The system will then only show you the topics you have selected for commenting).

1. Thriving places ✓
2. A growing and inclusive economy
3. Supporting health and wellbeing
4. Homes for all: safe, healthy neighbourhoods ✓
5. Density, Urban Living and Design ✓
6. Making it easier, greener and safer to travel into and around Bristol ✓
7. Accelerating climate action and nature recovery
8. Enabling thriving places: public infrastructure and services ✓
9. Minerals and Waste

1. Thriving places

Thriving places provide an overarching principle for the issues explored through this consultation. Thriving places are places where people can live well, where communities can benefit from economic opportunity and regeneration, and where homes, jobs, services, public spaces and transport work together. etc

10. What would a thriving place mean to you, and what do you think the local plan can realistically do to help create or support one?

Society comments:

Place-making in the city centre

The Local Plan could include a more coherent and inspiring vision for the City Centre, which can be communicated within the city, and where the opportunities can be promoted both within and outside the city.

Such a vision would join up:

- existing studies, masterplans, developer strategies for city centre areas
- the retail, cultural and leisure offer
- the centre with the more deprived inner city areas

4. Homes for all: safe, healthy neighbourhoods

What could be in the new local plan?

The new local plan needs to set out clear evidence on how much housing growth can be accommodated in Bristol, and where, within a constrained city. This means having a clear understanding of the scale of need, considering where this growth can be best accommodated across the city, and ensuring that this provides affordable housing to the people who need it most.

The local plan is not just about the number of homes, but about providing for the range of housing needs across Bristol's different communities and ensuring that new development helps create successful neighbourhoods and thriving places.

Challenges and Opportunities

- Delivery of significantly more homes within a constrained urban area while balancing affordability, viability, infrastructure requirements, environmental objectives and the needs of different communities*
- Collaboration with the Combined Authority (MCA) to plan for Bristol's housing need and identifying suitable locations (likely to be in 'Areas of Growth and Regeneration' as set out in Local Plan 2022-2040 as these are supported by approved frameworks or masterplans, but we will also be looking into identifying new sites and exploring ways to increase capacity across the city further)*
- Delivery of more affordable housing, of the right size and type*
- Provision of alternative forms of housing and developing policies and site allocations for more tailored housing solutions to ensure safe, healthy neighbourhoods to support occupants' wellbeing*
- Accommodating growth within a tightly constrained city while balancing housing, employment, environmental and community needs*
- Viability challenges: rising construction costs, changes to building regulations, and the additional costs associated with brownfield development make the viability of development challenging*
- Ensuring that new housing has the right supporting infrastructure delivered at the right time*

Society comments:

Timeline alongside the Spatial Development Strategy timeline

WECA's timeline for developing the regional Spatial Development Strategy is almost exactly parallel to the Local Plan 2045 timeline. Given the key dependency between the two, we do wonder whether it will work satisfactorily. It is not so much the communication between officers that is our concern, but it is how the political views of the member local authorities play out over the timeline. This is probably less of a problem with the current administrations than it was a few years ago, but nevertheless it may cause problems. The possibility of a neighbouring authority taking some of Bristol's housing requirement needs to be clear at an early stage.

The process for political negotiation about housing numbers across the sub-region remains unclear.

Housing is not just about total numbers. The right kinds of houses needed and the priorities for new houses should be set out in the Local Plan.

We suggest that there are multiple sources available to the Council for good data on housing need. The housing requirements to be given in this Plan must be based on a solid foundation of good cross-referenced data.

It is essential for WECA to address and resolve the allocation quickly. So many other aspects of planning policy in the new Local Plan will hang on the number of dwellings Bristol has to provide.

Greater pride and ownership happens if people can relate to character of place and its history.

We note that tall buildings are bad from the carbon point of view.

We note that the Planning Advisory Service has held workshops and issued guidance to address the issue of a Local Plan and a Spatial Development Strategy being developed at the same time.

5. Density, Urban Living and Design

What could be in the new local plan?

The new local plan needs to set a clear and confident expectation for what good density and design look like in Bristol to complement national policy. It should bring greater coherence to guidance that is currently spread across multiple documents, giving communities and developers a clear understanding of what is expected. Above all, it should establish how higher-density living in Bristol can be genuinely good to live in and contribute to thriving neighbourhoods, while responding appropriately to the different contexts and characteristics of the city.

Challenges and Opportunities

- Accommodating significant housing and development needs within a tightly constrained urban area
- Higher-density development that balances growth with quality of life that provides usable open space, appropriate infrastructure and a public realm that is safe and accessible for all to ensure neighbourhoods remain attractive, healthy, and inclusive places to live in
- Well-designed neighbourhoods that support local services, employment opportunities, social interaction, and sustainable travel
- Exploring how we can use our heritage assets and the wider built environment to create distinctive places that celebrate Bristol's diverse stories

15. When creating thriving and vibrant places, which of the following matter to you? Please tick all that apply.

A safe and welcoming public realm ✓

Providing open spaces ✓

Design that reflects local identities ✓

Making walking, wheeling and cycling possible ✓

Easier access to work, schools, and shops ✓

Daylight and sunlight ✓

Resilience to climate change ✓

16. Do you have any suggestions for how new development can engage with the meaning and history of its location?

17. Are there any other challenges or opportunities in this theme which should be considered as Bristol plans for future growth?

Society comments:

1 Tall buildings and urban density

The pressure for delivering the requisite housing numbers and densification has to come through one or more of the following approaches: tall buildings, density through medium-rise, greenfield development, development in adjoining local authority areas. We would like to see a shift from tall buildings to medium-rise. We believe that medium-rise is a better approach than a plethora of tall Buildings.

The Civic Society has made the point many times that Bristol needs an explicit Tall Building and

Urban Densification Policy.

The tall buildings policy should set out an assessment of the views and heritage impact, allowing for the topography of the city. (The 2005 Tall Buildings policy did that.) It should say where 'landmark' buildings are appropriate and where not.

The guidance document called 'Our Inherited City Heritage Statement' (which has been written but not yet published) should be incorporated in the Local Plan.

The policy should map acceptable building height across the city, ie a topography: a contour map of buildings. Especially in growth areas.

The tall building policy should be specific to use: residential including family, students, commercial.

The urban densification policy should prescribe both minimum and maximum density across the city, and prescribe medium-rise development to ensure that the housing numbers are achieved.

2 The 'Urban Living' Supplementary Planning Document

The 2018 Urban Living SPD "Making successful places at higher densities" constitutes valuable planning policy, much of which should be retained. In the recently introduced national planning policy rules, new SPDs cannot be created. Whilst existing SPDs remain part of the local planning policy, they will carry less weight over time, so it is important that much of it is incorporated into the Local Plan.

The Urban Living SPD is structured as follows. Part 1 should be incorporated in the Local Plan, but parts 2 and 3 may be precluded to the extent that they duplicate national design guidance

Part 1: Guidance for all major development

- ☐ City
- ☐ Neighbourhood
- ☐ Block and Street

Part 2: Guidance for major residential developments

- ☐ Shared access and internal spaces
- ☐ Private outdoor space
- ☐ Individual homes

Part 3: Guidance for tall buildings

- ☐ Visual quality
- ☐ Functional quality
- ☐ Environmental quality

3 Centres and railway stations

The Local Plan could consider greater densification in the city centre, at local centres, and other places with good transport connections.

16. Do you have any suggestions for how new development can engage with the meaning and history of its location?

New developments can engage with the meaning and history of their location through adaptive reuse, community co-production, and context-sensitive design that respects local scale and materials.

Scale and proportion: Match the height, massing, and street-level rhythm of adjacent historic buildings to ensure new structures complement rather than overpower the existing context.

Paying close attention to the topography of any development-site and its surroundings. Not dwarfing or hiding the existing historical buildings and features. Keeping a clear and sympathetic relationship to the existing skyline.

Over the long term, places like Bristol with strong, distinctive identities are more likely to prosper than bland “anywhere” cities. Every place must identify its strongest, most distinctive features and develop them. Else we run the risk of being all things to all persons and nothing special.

6. Making it easier, greener and safer to travel into and around Bristol

What could be in the new local plan

The new local plan needs to ensure that decisions about where growth goes are made together with decisions about how people will travel – not as an afterthought once a spatial strategy has already been established. This means the plan should give confidence that the city's most accessible and well-connected locations are prioritised for growth and ensuring, that the infrastructure needed to support that growth is delivered at the right time. This will support a resilient network that absorbs the cumulative impact of new development without undermining Bristol's wider decarbonisation and air-quality ambitions.

Challenges and Opportunities

- Ensuring that future growth can be accommodated within the city's existing transport networks without creating unacceptable impacts on safety, congestion, or network performance
- Assessment of constraints across all transport modes, including accessibility gaps, highway capacity limitations, congestion hotspots, and pressure on both the Local and Strategic Road Networks
- Addressing local issues such as parking standards, significant movement thresholds, strategic site-specific transport requirements to protect important local transport corridors, routes and future transport infrastructure
- Reviewing existing safeguarded land for transport infrastructure to ensure only realistic and deliverable schemes are retained
- Delivering a strategic transport vision that supports sustainable travel and improves connectivity across Bristol
- Identifying infrastructure gaps and accessibility issues, to target investment in transport improvements, safeguard key transport corridors, and support the delivery of both proposed and committed schemes
- Promoting sustainable transport choices, through improving network resilience, securing funding for priority projects, and ensuring that future development is supported by appropriate transport infrastructure

18. What are the main barriers that make it difficult to travel into and around Bristol using sustainable transport options, such as walking, wheeling, cycling or public transport?

19. What transport infrastructure or service improvements will be required to support new development while reducing congestion, improving air quality and lowering carbon emissions in Bristol?

20. Are there any other challenges or opportunities in this theme which should be considered as Bristol plans for future growth?

Society comments:

Transport connectivity

The Local Plan should include a more coherent vision for transport connectivity.

The aim must be for an integrated public transport system - infrastructure (easy transfer between bus/bus, bus/tram, bus/train etc); coordinated timetabling where appropriate; and an integrated fare system (ie single-ticket system that covers multiple modes of public transport). This is of course "received wisdom" in transport planning circles. We hope and expect that the Council's Planning group will work closely with the Council's Transport Planners

The vision for our city should be where:

- it is easy and affordable to move around
- you can move easily between your local centre, district and city centre for a wide range of

services and activities.

- there is easy access via public transport to employment, skills, shopping and leisure activities
- the new growth areas outside the Bristol boundary - Brabazon New Town, urban extensions at Hicks Gate and Ashton Gate for example - are integrated in the Bristol transport network
- young people living in the outer areas can go easily into and out of the city centre and other places, boosting inclusion and enhancing life opportunities.

Getting across and around the city is important as well as going in and out (circular routes as well as radial routes)

8. Enabling thriving places: public infrastructure and services

What could be in the new local plan

The new local plan will focus on providing infrastructure for strategic allocations and key growth areas. The plan will be informed by an understanding of the availability of community facilities and public service infrastructure and plan for additional provision until 2045, accounting for local health needs and maximising opportunities to reduce inequalities. Land will be allocated for different purposes when appropriate and will set local standards for provision of different types of recreational land and facilities (for example, for play, sport, informal recreation and allotments).

Challenges and Opportunities

- *Considering potential viability challenges associated with bringing forward proposals, given high construction costs and constraints*
- *Ensuring all infrastructure (particularly water and energy) is climate resilient, can withstand heat and water stress, utilise renewable energy sources and support nature restoration, in line with wider Council objectives*
- *Providing support for third party providers of infrastructure, particularly in cases where there are no medium to long-term delivery plans in place*

Society comments:

1 Parks and green space standards

We continue to be of the view that the targets for open space provision in the city centre and inner areas are inadequate and should be reviewed. We accept that they need to be realistic, but they should be more ambitious. We must respect the given minimum standards of green space per resident. Green spaces and parks are essential for healthy living and creating a thriving urban environment.

The Bristol Parks and Green Spaces Strategy (P&GSS) 2024-39 remains relevant and should be followed.

The Local Plan should contain the P&GSS minimum standards, not just refer to them.

As an aside, for example we deplore the inadequate green space allocation proposed in the current St Philips Marsh Masterplan. This makes a mockery of the Council's own guidelines!

2 Local Green Space designations

The Local Green Space designations in the draft 2040 Local Plan had to be removed from the Plan because the Inspectors deemed that evidence was lacking. They also seemed to think that the LGS designation was not intended to be used so widely as the Bristol Local Plan had done.

We would expect this to be revisited in the Local Plan 2045. Local Green Space is an important designation, especially in a closely-packed city like Bristol.

Anything else to say?

Is there anything else you would like us to consider as we begin preparing the new local plan?

No