



Bristol Local Plan Review

CPRE Avonside Response

May 2019

GENERAL COMMENTS ON THE DOCUMENTS THEMSELVES

We find the present arrangement and layout of the draft Local Plan (LP) documents confusing and consider that further thought should be given to making policies more transparent and easier to locate. We are pleased to note (1.10) that the rewritten local plan will combine the LP into a single document, which implies a single volume, but the arrangement of policies and text needs reconsidering. At present the documents and their contents do not hang together in a logical fashion. At the launch of the Review, Mayor Marvin Rees stated “I would encourage everyone to take a look at the plan and help us to shape Bristol for years to come.” It is hard to imagine how easy the majority of Bristol residents would find it to navigate the documents to locate all the proposals affecting their locality.

Examples of Areas of confusion and lack of transparency

Titles of the Constituent Documents

The main policies document is entitled **Draft Policies and Development Allocations (DPandDA)** but the Annex is also called **Draft Development Allocations (DDA)** and the web page referring to the latter is called **Site Allocations**.

Given that DA1: Proposed Development Allocations is a policy within the DPandDA, the main document only needs to be entitled Draft Policies. If the intention is to combine the 2 documents in future, rather than the DDA to be an Annex, this should be made clear. However, “Development Allocations” implicitly suggests that it includes all sites proposed for development.

Development Strategy Sites and Draft Development Allocations

It would certainly be helpful for the understanding of which locations are proposed for development if both the Development Strategy areas and the Draft Development Allocations sites, could be brought together.

The contents page item 17 refers to DDAs as located on page 135. On page 135 17.5 states “Draft Policy DA1 **Proposed Development Allocations** lists the new development allocations proposed under the Local Plan Review. But there is no sign of a “list” under DA1 - the “list” is provided in the mapping in the separate Annex document. It is really confusing to have “Development Strategy” sites mapped in a completely separate document from “Draft Development allocations” .The intention in DS1-14 is to show the areas of “Growth and Regeneration” and set out a direction for specific parts of the city, while the Annex of DDAs includes sites outside the Areas of Growth and Regeneration, but both show specific sites which need to be easily viewed as a whole. The DDAs may not be sites within areas of “Growth and Regeneration” but they are sites which are proposed as suitable for possible future development.

For example, Glencoyne Square in Southmead is a specific Development Strategy site within Central Southmead, (DS14) while neighbouring Lanercost Road Southmead which leads into the Square is a “Draft Development Allocation” site in a different document. It takes tenacity to link the two together from widely separated locations on the online version.

Mapping as a Whole

The Current Local Plan much more helpfully contains a Site Allocations Policies Map which shows the various different designations for all the areas with the city. This allows a comprehensive overview of the various areas of the city. And while the protection of open space has been given well deserved prominence, separating the mapping of Green spaces into the “Proposals for the Protection of Open Space” document is not helpful to viewing locations overall especially as the Open Space sites are hard to locate on the online mapping system.

The Meaning of “New and Affordable homes”

Throughout the policies on the development strategy, urban living and housing the phrase “new and affordable homes” is used. The logical interpretation of this phrase is that either some houses are new and others are affordable, or that all are both new and affordable.

Unhelpful Diagram in Section 6: Urban Living

Diagram 6.1 is confusing. Because one colour blue washes over existing housing and darkens the colouring in those areas it appears that there are 6 colours on the map, not the 5 in the key.

Partial duplication of text and misprints in GI policies

While we commend the prominence which has been given to open spaces, we find it confusing that the Policy text for GI1 and GI2 are repeated word for word on pages 8 and 9 of the separate **New Protection for Open Spaces** document, but the Policy text for GI3: Incidental Open Space is not repeated. Instead paragraph 2.16 on page 10 merely mentions that there is a policy and refers the reader back to the main **DPandDA** document. This is illogical and confusing.

Additionally, there appears to be a “cut and paste” error in the Policy text for GI2 which is similarly transferred to page 9 of the **New Protection for Open Spaces** document. The policy text correctly starts by referring to Reserved Open Space but the final paragraph incorrectly refers to Local Green Space in the text “Ancillary development of a proportional scale that supports the function and role of the Local Green Space may be acceptable provided it does not have a harmful impact on the space as a whole.” This has obviously been cut and pasted from the policy text for GI1 on Local Green Space.

Unhelpful location of the section on Food Systems within GI4: Stapleton Allotments

Draft policy GI4 is headed **Stapleton Allotments and Holdings - Food Growing Local Green Space**. However, tucked away after the Explanation section of the policy is the heading **Food systems** which appears to be a subset of the policy on Stapleton Allotments rather than having a priority of its own. As Stapleton Allotments are just one site which contribute to local food systems in Bristol, the arrangement should be reversed.

COMMENTS ON SPECIFIC POLICIES IN BRISTOL LOCAL PLAN REVIEW: DRAFT POLICIES AND DEVELOPMENT ALLOCATIONS

2. Vision

2.3 While we commend the basic principles of the Vision for the city, we are hugely concerned by the apparent predication of the entire Plan Review on a desire to produce policies which will allow the council to exceed the target number of 33,500 for housing which is being dictated by the Joint Spatial Plan (JSP). Our firm view is that the number of new houses predicated by the JSP is already in excess of what the latest economic indicators suggest will be needed. The effect of this over-provision on the whole sub-region is immensely serious because it will further increase congestions, the economic costs of delays and pollution. In short it will make it even more difficult to achieve the desired goal of sustainability and climate change mitigation.

We can only presume that, perhaps for understandable reasons in the light of current government policy, that this is as a result of a perceived need to “hedge bets” in case the JSP Examination later this year results in an even larger target number for Bristol than in the submitted JSP. If this is the case, then the document should make a clear statement to that effect. Given the volatility of the economy, especially in the short term, there should be a statement to the effect that numbers could be lower. We would like it to be made clear how exceeding the target number will affect the need to meet future housing targets.

It is vital that Bristol can accommodate this extra housing without undermining quality of life, such as access to green space, clean air, and a reliable public transport system. We are concerned that by both promoting densification right across suburban areas and offering up a raft of potential extra sites to developers, the years beyond 2036 will then see the plundering of some of those areas designated “Reserved Open Spaces” and a further creeping degradation of the environment.

4. Development Strategy

We support the aim in 4.02 to “set out an approach to inclusive and sustainable growth and development, addressing the needs of everyone in all parts of the city” which

should be the overarching purpose of the Review. However, we disagree that there is a need right now to exceed the housing target, as indicated above.

4.05 should include a strategy to offer protection to suburban gardens which have a value for climate change mitigation, wildlife and biodiversity.

4.06 “The development strategy sets out a direction for each part of the city and identifies specific locations for change and development.” This should cross refer to the Draft Development Allocation sites contained in the separate document.

Draft Policy DS10: Changes to the Green Belt in South Bristol

We do not accept the proposition in 4.3.16 that the proposed changes reflect “exceptional circumstances”.

The proposed changes constitutes piecemeal “dabbling” and if there were to be any changes to Bristol’s Green Belt this should form part of a wider West of England review of the Green Belt. Any Green Belt land which is lost should be replaced with additional Green Belt, not partially built on or replaced with designations of a lower status as proposed in 4.32.

We do not support the suggested changes in 4.3.18 to the Green Belt at South West Bristol. The suggestion that the new road [Colliters way] is the reason for changing the Green Belt boundary is perverse. Roads are not uncommon in Green Belt areas, and much of the land on the city side of the road is ‘open’. The text considers that the Green Belt will no longer “serve its purpose” as a result of the introduction of the new road and MetroBus system. However, one of the main objectives of the Green Belt is to prevent urban sprawl. Bristol should look to its previously developed land and wasted space before it ‘sprawls’ south into the Green Belt and open countryside.

We concur with the sentiment in 4.3.20 that the Green Belt plays a strategic role in containing the outward expansion of Bristol, providing a green setting for the city and focusing attention upon the regeneration of previously developed land in the urban area. However, the proposed piecemeal removal of chunks of Green Belt to the South of Bristol fail to uphold these objectives, especially in the light of challenges to its ability to do this from other Local Authority areas.

There is a wider and equally significant omission from the plan, namely the absence of any discussion about the relationship between and interdependence of the city and its surrounding rural hinterland. This is of enormous benefit to Bristol residents and is indeed often a key reason for people relocating to live here. Land is part of the natural capital available to us all, and should be recognised and valued as such within this Plan. Its value in absorbing excess rainfall, providing for the growth of trees as well as food crops, providing green space for health and well-being is not adequately considered within this document.

Provision must be made for good public transport links from rural - where facilities for everything from education to services are fast declining - to urban where provision is increasingly concentrated. Provision should also be made in this strategy for collaboration with the telecoms providers to produce consistent quality internet links. This is particularly important for residents in rural areas, and outlying housing areas, where govern-

ment services are frequently only available online (e.g. Defra claims, Single payments etc)

Draft Policy DS11: Development allocations - southwest Bristol.

We do not agree with the proposal to develop the fields at Yew Tree Farm with 200 houses, having removed them from the Green Belt. We disagree that this land constitutes the 'exception circumstances' required by the NPPF, as it is both open and has been farmed historically. This land provides a vital 'green lung' to the south of Bristol, which already suffers problems with air quality. The footpaths and country lanes are also easily accessible by walkers and cyclists from the nearby city, providing a much needed escape from the city accessible to those without access to a car.

This proposal is also contrary to the aspirations expressed in section 10.20: **Food Systems**: "The issues of food production, quality and security impact directly on the health and wellbeing of current and future generations and are important concerns to Bristol City Council, stakeholders and residents in the city". Surely those few viable farms which still exist with the city boundaries should be nurtured and preserved, and not sacrificed to a desire to exceed housing targets. Yew Tree Farm is a model of good farming practice and should be protected.

We note that in the Response from the Council to the initial consultation on the Local Plan Review that "The impact on Yew Tree farm was also raised as a concern". However, no Council response is recorded to this concern.

Draft Policy DS12: New neighbourhood - Bath Road, Brislington

We do not agree that this former contingency site should be brought forward for development at this stage. Urban areas need their green spaces and, while we welcome the retention of the allotments, it is not just allotment holders that require access to green space. Green Belt land has the highest protection from development in planning policy, for good reason. It is the permanence of the Green Belt that has been its success, ensuring that city dwellers can access green space, and encouraging cities to regenerate and intensify, using otherwise wasted space, before building outwards and creating urban sprawl.

We consider that Bristol should stand firm on its commitment to the protection of its dwindling protective girdle of Green Belt land for as long as it is able; to present a strong argument against it being swallowed up before brownfield sites in the city have been fully exploited. At a time when climate change threatens the wellbeing of city dwellers, the loss of a vital green lung around the city might in future be seen to be a heavy price to pay for the construction in the short term of dwellings which could meanwhile be built within the existing built-up area.

4.4: North Bristol

We are pleased to note that areas of Lockleaze and Central Southmead have been designated for growth and renewal. However, we are slightly concerned at the wording in 4.4.2 that North Bristol will remain a location for **urban** living. Nowhere in the documents is any reference made to **suburban** living, which has quite different characteristics. Bristol is a city where both sit side by side. Parts of North Bristol are characterised by their suburban character - the existence of a "town centre" consisting

of a street of shops does not take away that character. Areas like Henleaze, Westbury on Trym, Westbury Park Stoke Bishop, Sneyd Park, St Andrews and parts of Henbury should continue as “leafy suburbs” which contribute much to the city, especially in terms of climate change mitigation and biodiversity.

5. Infrastructure and Developer Contributions

Draft Policy IDC1: Development contributions and Community Infrastructure Levy (CIL)

We are pleased to note the prominence given to the need for infrastructure where there is new development. However, it is vital that infrastructure is not only “coordinated” but that it precedes, or complements development and that local people are fully involved at the planning stage in decisions on what kind of infrastructure is required.

However, any new development **must** be planned and developed in line with the transport hierarchy: 1. Walking and cycling; 2 public transport ;and only then 3 provision for private access for those for whom there is no realistic alternative. CIL moneys must be invested in **advance** of the build out so that residents have immediate access to the climate friendly means of travel. (see the Freiburg extension/suburb model).

Retro-fitting this approach should be a priority for all existing housing areas within the sub region.

6. Urban Living: Making the best use of the city’s land

We support the proposal to maximise the efficient use of land but not as a means to exceed the target level of homes set out in the Joint Spatial Plan. However, we are rather concerned by the wording in 6.2 “balancing the efficient and effective use of land with aspirations for making quality places to live.... “as though they are in opposition to one another.

On the contrary Section 2 paragraph 8c of the NPPF: Achieving Sustainable Development states that the third overarching objective is an **environmental objective** - “to contribute to protecting and enhancing our natural, built and historic environment; **including making effective use of land**, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

We consider that more thought should be given to the Plan’s definition of “effective” in line with the NPPF, which includes it within an environmental objective, rather than it purely being applied in relation to “the focus on the delivery of new homes”

Draft Policy UL1:Effective and efficient use of land

Paragraph 6.4 should state that the use of previously developed land should be prioritised.

Policy Text

Efficient Use of land is more than purely optimising density. The Policy should include reference to use of land to afford provision for climate change mitigation within development sites.

While we agree that much of Bristol has a strongly urban character we feel that far more recognition should be given to the specific character of suburban areas as we have already pointed out under 4.4 North Bristol. In diagram 6.1 all parts of Bristol are referred to as either Inner Urban or Outer Urban. Not all those designated as “outer urban” have the same characteristics or should be subject to the same level of density. It is impossible to equate for example some of the already more densely developed areas shown on the map as Outer Urban Area (more intensive) with those where larger gardens or open spaces are more characteristic.

We would also welcome more recognition of Bristol’s inherent and important link with its local countryside. Bristol itself covers some important areas of countryside, including Green Belt, and this interconnection between urban and rural should have greater recognition within the text of the Plan to represent how important that connection is for many Bristol residents.

Draft Policy UL2: Residential Densities

Policy Text

While we are fully in favour of maximising densities in suitable locations we do not consider that the statement “Densities below the minimum should only occur where it is necessary to safeguard the special interest and character of the area” is sufficient for effective decision making about planning applications. While historic documentation, listed building or Conservation Area status would clearly demonstrate such a need for safeguarding, in other areas a judgement would be highly subjective. We consider that the value of a location for wildlife, biodiversity or climate change mitigation, where densities below the minimum would be desirable, ought to be included in this policy,

7. Housing

Again, we are concerned at the constant reiteration of a desire to exceed Joint Spatial Plan housing targets.

Draft Policy H1: Delivery of new homes

7.2 shows an almost desperate desire to reiterate the concern in 7.1 that the whole focus of planning policy is now to exceed housing targets. However desirable it is to meet housing need, which in Bristol is overwhelmingly for affordable housing, the policy text which explains the overriding purpose of the Plan as “Establishing a planning approach which sees development of new and affordable homes as a **primary objective** in development decisions” seems to totally ignore any other criteria for creating a city which fulfils the aspirations of **Vision** section 5.3: A city with a high quality, healthy environment, with attractive open spaces, clean air, vibrant and inclusive sports and cultural facilities, cherished heritage and communities engaged in the development of their city.”

7.3 This text seems superfluous given that it merely reiterates the point in 7.1 and 7.2 that “This policy sets out the housing requirement for Bristol and the aspiration that it will be exceeded.” (Also repeated in 7.5)

Providing Affordable Homes

Given that the provision of affordable homes ought to be given priority we feel this section should be given greater prominence. We absolutely support the provision of a range of affordable housing (including social and rental) and feel that this should have a policy dedicated to it, rather than it being a series of paragraph notes (7.6-7.10). If JSP Policy 3 will become the development plan policy for affordable housing in Bristol, this should be incorporated more clearly into the Local Plan Review documentation. As the Joint Spatial Plan will not be examined until July, with a completion date of October, and no guarantee that it will be adopted, we would like to see more clarity on how provision of affordable housing will be addressed in the interim, given that this is such an important requirement.

“ 7.8 JSP Policy 3 will become the development plan policy for affordable housing in Bristol when it is adopted later this year. Meanwhile, affordable housing will continue to be sought in line with existing local plan policies BCS17 and DM3, supported by the council’s Affordable Housing Practice Note which has introduced a fast track route for processing of planning applications and greater flexibility in tenure requirements for affordable housing.”

Draft Policy H4: Housing type and mix

Policy text

Given that this policy appears to encourage a mix of housing types and sizes it isn’t clear whether the line of text stating that an appropriate mix should **have regard to** “the existing housing profile of an area” means that development should conform to that profile or seek to vary it. Similarly, “The need to redress any harmful housing imbalance that exists in the area” is ambiguous - in what sense would an imbalance be “harmful”? We would expect to see more clarity on the type of mix that the Local Plan is looking to achieve, i.e. that it is seeking to meet the identified housing needs of local people.

Draft Policy H5: Self-build and community-led housing

We are pleased to see the encouragement for self-build, custom housebuilding and other community-led housing in this policy. We do not however agree that Stapleton Cricket Club ground is a suitable site for such development.

Draft Policy H9: Accessible homes

We are pleased to note the inclusion of this policy in the light of the aging population of the city.

10. Green Infrastructure

Paragraph 10.1 needs to be more comprehensively worded. In fact, it should include some of the wording from the Multifunctional Green Infrastructure section of Climate Change and Sustainability paragraph 13.35, including “ It can also protect and enhance

biodiversity, improve visual amenity, provide green and active travel routes, improve mental and physical health of local communities, provide space for food production, and improve water quality.” This would provide a more overarching introduction to the concept of Green Infrastructure (GI) than just the policies on Open Space which follow. We consider this to be of particular importance as GI policies often appear to be in conflict with some Local Plan Review policies where the pressure to meet and exceed housing targets is evident. In our opinion if new housing delivery policies are persistently to reiterate the aspiration to exceed housing targets, it is equally important to strengthen the commitment to the protection of GI into the future.

We are not in agreement with the statement that existing policies are providing an **effective** framework for maintaining and enhancing the city’s GI network, given the relentlessly creeping incursions into green spaces within the urban area.

As one example we are concerned that while BCS9 states that GI includes parks and gardens, nowhere in the Local Plan Review are gardens mentioned. Research increasingly points to the importance of biodiversity in urban gardens (e.g. Sheffield BUGS Project <http://www.bugs.group.shef.ac.uk/BUGS1/updates.html>). It appears that within cities, taken as a whole, gardens constitute the majority of GI, and provide the greatest range of biodiversity. If open spaces are to be lost during the Local Plan period, it is all the more important to have strong policies which protect valuable garden spaces, particularly larger mature gardens and those with good tree cover. For this reason, we would have liked to have seen some strengthening of DM21 to protect against loss of such gardens which are claimed to be in “sustainable” locations and thus appropriate for development. In the absence of a review of DM21 we would wish to see some clear pointer in section 10 towards the need for the value of gardens as GI to be given equal weight, especially where the sustainability argument is related to proximity to a “town centre” which may become little used within a few years, or to a bus service which may be withdrawn.

Open Space

Draft Policy GI1: Local Green Space

The sentence in paragraph 10.7 “The designation allows the protection of open space that is demonstrably special to a local community **having unique characteristics that require safeguarding**” implies that all LGS will have unique characteristics - which would be very restrictive. It contradicts paragraph 3.12 in the section of the New Protection for Open Space document on Interpreting Local Green Spaces within Bristol, which states: “The demonstrably special nature of the space **may** also be indicated by a unique nature and character...”. (Strange then that the table of Values of Local Green Space which appraises each LGS site in the latter document doesn’t include a column for “Unique nature and character”). It is well documented that access to local green space, on your door step, is beneficial for both physical and mental health, particularly of city populations. We would like to see recognition of that benefit, and open space that is important to the local community should qualify for protection.

Policy Text

We would like the first sentence to read: “Land identified as Local Green Space is **specially protected** and will be retained as open space.”

The second sentence appears at first sight to be contradictory. It should be moved to the end of the second paragraph, relating to ancillary development which might be allowed. It would be helpful to include other examples of ancillary development which might be related to quite different purposes of an LGS rather than sport or formal park use - for example a bird hide where there was a wildlife value contributing to the designation.

Draft Policy GI2: Reserved Open Space

We consider that at a time when climate change mitigation is so important that a wider and clearer definition of the purpose of many types of ROS should be given.

Policy Text

The text appears to place an implied emphasis on the designation of an ROS as being for sport or as a park. Either 10.1 or the Explanation need to make clear the many other functions of ROS - including landscape value or biodiversity.

There is a previously noted misprint in the final sentence of the policy text which refers to Local Green Space instead of Reserved Open Space.

Draft Policy GI3: Incidental Open Spaces

In the light of the titles of the other two designations, perhaps the title should be in the singular.

We agree that such informal open spaces often have considerable value. We are not entirely clear how a judgement would be made as to their significance if they were proposed for development, but would like to see an undertaking that there would be community involvement at a pre-application stage where there was a planning application for an IOS site.

Policy Text

The text needs the addition of "climate change mitigation or biodiversity" as criteria for their designation.

Draft Policy GI4: Stapleton Allotment and Holdings

We welcome and support the proposal to remove the current designation of the land at Stapleton allotments for transport infrastructure in recognition of their importance for being sited on an area of Best and Most Versatile agricultural land and their use for local food growing.

Food Systems

We feel that this section should be given more prominence. It almost appears to be subsidiary to the policy on Stapleton Allotments. It should have its own policy, however brief. This should also refer to community gardens and the City Farms.

The statement in 10.21 "The council will continue to have regard to matters related to food production, food quality and food security as part of this local plan review" is not sufficient. We are concerned that despite the protestations in 10.20 about its support

for the 2013 Good Food Plan and the 2011, *Who Feeds Bristol* Report, it is still allowing the loss of land currently dedicated to local food production. In particular we strongly object to the loss of land vital to the viability of Yew Tree Farm, as outlined under our comments on DS11 above. If issues of local food production are so important to the Council as is claimed, there should be protection given to this farm, which would otherwise be able to continue as a model of good farming practice and local food production, and as a source of education on such matters for residents of Bristol, in the same way as protection has now been given to Stapleton Allotments.

Pollinating Insects

This section appears as something of an afterthought. We are not clear as to the meaning of ... “the council will secure species beneficial to pollinating insects as part of the required green infrastructure in development proposals”. Does it mean that it will require development proposals to include provision of these (plant?) species.

We would rather see a more expanded section on “Biodiversity” which could include pollinating insects.

11. Transport

Paragraph 11.5 says “The objectives of the strategy will be achieved by a number of outcomes and actions. The finalised Bristol Transport Strategy will be published in 2019 and its proposals and objectives will inform the local plan.

Firstly, in terms of a sensible and logical process, we fail to see how it can inform the local plan which is already out for consultation?

Draft Policy T2, (Transport schemes) is also unsatisfactory. It says:

“A number of potential transport proposals are the subject of ongoing technical studies. The local plan will include a policy which identifies and protects any routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for development. This policy will include some identified in the current local plan as well as new proposals contained within the JLTP4 transport programme. The policy will also safeguard railway sites and associated land, which are required for rail infrastructure improvements. Existing transport facilities such as transport depots will also be safeguarded where required.”

The JLTP4 Transport programme is itself deeply flawed, not least because there is a huge (£6 billion) “funding gap” and there have to be major doubts about whether significant parts of the plan can ever be delivered. Perhaps even more important, the plan’s own figures suggest that it is most unlikely to improve pollution levels, which are a major issue for the city, and may not even satisfactorily mitigate the additional impacts of JSP planned development.

While CPRE of course welcomes in principle policies such as Draft Policy T3 (Car and cycle parking provision for residential development); Draft Policy T4 (Cycle parking provision for B1 office development); and Draft Policy T5 (Provision of infrastructure for electric and other low emission vehicles), in the absence of a full alignment between this new local plan and the Bristol elements of the JLTP4 it is not possible to arrive at a sensible understanding of the vital transport improvements needed or their adequacy.

13. Climate Change and Sustainability

We are pleased that this issue now has a dedicated policy which will become increasingly important during the lifetime of the Local Plan. We agree with the majority of the text, however given the recent determination by Parliament that Climate Change is an emergency we feel that the wording of paragraph 13.1 now needs to reflect this. The introductory paragraphs should also include the fact that not only should buildings be comfortable to inhabit, but that developments should also provide mitigation for climate change.

We welcome the statement in 13.2 that an assumption of zero carbon is to be taken into account at the earliest concept stage. With regard to the economics of land acquisition we consider that where development of a greenfield site is proposed, especially involving the loss of trees and hedges, an assessment should be made of the level of loss of capacity for carbon capture etc.

Draft Policy CCS3: Adaptation to a changing climate

Policy Text

Site -level adaptations

We would like the second bullet point to read: “Provide comfortable external spaces in hot weather, **maximising the use of green infrastructure**”

Vulnerability

We feel that paragraph 3.34 would be more accurate if it read “ Where the development **is designed for the occupation or use** of those who are more vulnerable to the impacts of climate change ...” Otherwise it might be seen to apply to any residential property where the occupants might happen to be in these groups.

Multifunctional Green Infrastructure

We are pleased to note that 13.35 is a comprehensive statement on Green nrastructure. As noted above, much of the wording should also appear in the introductory paragraphs to section 10: Green Infrastructure.

14. Design and Conservation

Draft Policy DC2: Tall buildings

Tall buildings are not the answer to increasing densities, and can bring their own problems. Within the context of a move towards compact living and increased density, we believe that buildings should be judged on their merits, their design and impact on the character on landscape, rather than their height. While the policy text does to a certain extent limit the capacity for harmful developments of this kind, we are not convinced that there is no risk of large-scale clusters of tall buildings being created

which would alter the characteristic appearance of the central area of Bristol thanks to a misguided approach to “regeneration”.

Draft Policy DC3: Local Character and Distinctiveness

We note that this new policy introduces the concept of allowing innovation and change in a local environment through introducing new scale and form. While there is certainly scope for such developments in specific locations and within large scale new sites, we are concerned about how judgements are to be made on whether they would have harmful effects within different areas of the city.

Policy Text

vi We feel that the current wording in Local Plan policy DM26 General Principle iii “responding appropriately” rather than “complementing” was preferable.

We are pleased that the policy still contains the caveat that development will not be permitted where it would be harmful to local character and distinctiveness, but regret that in the pursuit of an aspiration to maximise numbers of dwellings to meet inflated targets, the requirement to respond appropriately to height, building lines, sky lines etc. has been dropped. There is a risk of a resulting hotchpotch of developments and “town cramming” where random individual infill development is allowed, especially now that the proviso has been dropped that infill development will be expected to have regard to the character and quality of the surrounding townscape.

In Explanation paragraph 14.19 now that the words “including new types of design, scale and form” have been added to the current policy text, we consider that the wording should no longer be “**In most contexts**, however, there is scope for innovative and contemporary design solutions, including...” but “**In some contexts...**”

In 14.20 we do not understand why the word “necessarily” has been dropped from the current General Principles (2.26.7) which states “Sustainable design is not necessarily incompatible with local character and distinctiveness.

Nor in 14.21 why the word “challenge” has been dropped from 2.26.8; nor why the text of 2.26.9 on the role of new landmarks has been totally omitted.

15: Health and Wellbeing

We welcome the new and updated policies in this section on Pollution, especially the inclusion of references to light pollution and those on Water and Air Quality.

17: Draft Development Allocations

As we have already pointed out, it is confusing to separate these from the Development Strategy sites and to refer in paragraph 17.5 to Draft Policy DA1 as listing the new development allocations proposed under the Review, when it doesn't.

COMMENTS ON BRISTOL LOCAL PLAN REVIEW: NEW PROTECTION FOR OPEN SPACE

We are pleased to note the prominence which has been given to the protection for different open space areas, including Incidental Open Space(s) and we have already

commented on the policies GI1-GI3 themselves in our comments above on the Development Management Policies document. We have two further comments on the introductory text:

Paragraph 2.15 makes no sense. Also, the draft plan proposes three forms of open space designation not two.

This may help explain why 2.16 only refers back to the Policy text on Incidental Open Space(s) which appears in the main document, unlike the other two designations. The Policy text for IOS should be included here, if it is judged that the policies need repeating in this document.

However, more seriously, while the idea of protected open spaces appears clear cut, we are not convinced that this process is sufficient to protect enough open space in the city.

We are not able ourselves to review all the proposed designations and are concerned that while some areas have their own local planning groups who are able to respond it is possible that less well-resourced areas of Bristol could be disadvantaged if there is less ability or inclination to identify spaces that should have been designated or given a different designation.

As noted in our comments on the Open Space policies, 3.12 states that the demonstrably special nature of a Local Green Space may be indicated by a unique nature and character, yet this is not a criterion in the Indications of value in Table 1.

We have some reservations about the way that assessments have been made for the two main designations.

We are concerned that although allotments feature as a typology in the Grouped open space types of Table 2, and the description says that sites can include "Community Gardens", there is in fact only one Community Garden given a designation in the list of Reserved Open Spaces in Table 4: Marshfield Road Community Garden. Yet there are many community gardens throughout Bristol which should have ROS designation and these should be added. We also note there is only one city or community farm included (St Werburgh's) and again they should all be.

We would like clarification of the detail in 3.22 which states that 569 sites were appraised, with a determination of 158 Local Green Spaces and 411 Reserved Open Spaces. This implies that none of the sites which were appraised were rejected for either designation, yet it is clear that some sites proposed by communities have not been included.

It is sometimes unclear why particular sites have been designated as LGS and others as ROS. It is impossible to list all the anomalies, but for example:

LGS24001 Gainsborough Square Lockleaze is hardly notable for its tranquillity, surrounded as it is by busy one-way roads which are a bus route.

LGS32007 Sea Mills Square, which is designated because it has value for Beauty, Recreational value and Historic Significance does not possess those values to a greater extent than some of the ROS, including nearby ROS32010 Stoke Lodge which merits LGS status.

ROS33011 Former Wesley College is not mapped as including the field to the east of the College which links ROS33011 to LGS33004 Sheep Wood. The whole area is a single entity and the field should be included.

The area mapped between LGS33002 (listed as Coombe Hill Golf Course but actually Henbury Golf Course) and LGS17001 Blaise Estate, consisting of the fields to the north and south of the Cherry Orchards Community has been excluded from any designation. The fields should at least have ROS status. They are adjacent to footpaths to the western side of Blaise Estate, from where they present a tranquil and rural view towards Westbury on Trym. The grounds of Cherry Orchards itself also have great community value and they are used for food growing.

The grounds of Cote House in Westbury on Trym are no longer listed as having any designation. They have value for Beauty, Tranquillity and Historic Significance, and should be included.

Finally, it is not clear how it is intended that the regular review of Reserved Open Spaces as outlined in 3.16 will be undertaken. This should be clarified. We would hope that these are formal reviews such that further designations of sites which have been overlooked could be included at these later stages.

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