

## **WHaM response to the Bristol Local Plan Review 2019.**

WHaM was pleased to have the opportunity to comment on the local plan and found much within the document that was positive but has highlighted several areas where we felt that the policies given could go further.

Particularly we were interested in the following areas:

### **Policy DS2:**

The process for master-planning the area around Temple Quarter was welcomed, and was supported. We hope that this will also include looking at the area along York Road and the interface with the Central Bedminster area, this should be included as it is likely that increased foot and vehicle traffic will be moving in this direction from Bedminster, as it develops and regenerates, and the light industrial units along York Road may be redeveloped in the future.

### **Policy DS8 Central Bedminster:**

The policy makes note of the possibility of at least 2,500 homes in the area. There is also the provision for up to 1,000 student bed-spaces in the area. The group notes that a planning application for 500+ student bedrooms has already been submitted. Another may be in the pipeline.

Critically it notes that the area should be developed for a mix of residential, workspace and community uses.

It notes that tall buildings in the right location, designed in accordance with policy DC2 might be appropriate if well sited. The policy must re-iterate that these tall buildings should be sited away from topography that they would mask if built. This would include Pyle Hill and Windmill Hill.

120 dph will be sought as a minimum but 200 dph (city centre) may be more appropriate subject to a coordinated approach to development which delivers quality urban design. Whilst no maximum is noted in this policy we suggest that there ought to be one, some densities in proposed schemes have vastly exceeded the 'appropriate limit' (possibly going as high as 600dph) and will harm the area with over-development out of scale with any context, and flooding the area with an overabundance of housing.

As it stands we think this policy does not go far enough to ensure the right kind of accommodation is built in the area. If the city council is to mandate how many homes it believes should be sited within an area, then it should verify what these should be to avoid over provision of types that are not required and avoid missing out on what is needed. This would then reinforce the ideas raised in policy H4. This policy was broadly supported by WHaM subject to the above.

The requirement for a masterplan for the area north of Bedminster Green and towards York Road must also be considered within the policy for Bedminster Green, there is a light industrial area here which may be redeveloped along with the rest of this area and the council must not miss out on this opportunity to mandate for appropriate development.

### **Policy H4:**

This policy declares that a city is better off with a mix of housing in order to future proof for the changing needs of a society. This is especially relevant regarding the large developments at Bedminster Green whose applications have consistently been filled with 1 and 2 bedroom flats.

Developments are required to:

Have regard to the existing housing profile of the area (i.e. existing types)  
Local housing requirements including redressing any imbalances within the area  
The characteristics of the site including its suitability for different housing types  
Bedminster Green is a 'Growth and Regeneration Area' this means that:

“an appropriate proportion of homes of various sizes will be sought in accordance with the provisions of those policies and any relevant supplementary planning documents, masterplans or spatial frameworks.”

It states that:

“A number of evidence sources including local housing needs studies can be used to inform the approach.”

As noted above we would suggest that the city council produce their own studies on areas they are defining specific policy for, otherwise they will be entirely dependent upon studies from developers which may not be impartial.

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

This seems to be intended to avoid harmful concentrations of student accommodation in some areas. It allocates a maximum of 1,000 purpose built student bed-spaces in Bedminster. Current applications (one submitted, one in the pipeline) exceed this.

Student accommodation will be encouraged to be car free and students are to be deterred from parking elsewhere in the city, but it is impossible to stop people from owning cars entirely with planning legislation.

Schemes should include active frontages, and ground floor uses and avoid causing harm to surrounding communities. There will have to be a management regime for each of these so there will be a point of contact for neighbouring residents.

There is no discussion of what the harmful consequences of over concentration might be to an area.

It was felt that this policy was aimed at making sure student accommodation is able to integrate students into the community, and seemed to be outlining areas not to place them rather than providing guidance on how to ensure sites were suitable and what facilities they could provide for the community and what the community could provide for them. It should be noted that for integration a 2 way dialogue between student accommodation and community is important.

#### **Policy G13: Incidental Urban Green Spaces**

This policy provides protection for incidental green spaces.

The text reads:

“Development involving the loss of incidental open space will not be permitted where the space is locally important for recreation and leisure use or townscape and visual amenity.”

This is an opportunity for us to have local green spaces protected, the policy should consider impacts of development on land adjacent to green space as well as the direct loss of the space to development which would also satisfy the above text.

#### **Policy T3: Car and cycle parking provision for residential development**

Developments will be encouraged to have lower parking provision, designed in on-street provision is preferred.

Car clubs and transport hubs nearby or proposed will be taken into account in new developments when allocating car park numbers.

Garages and allocated parking will be discouraged.

The group supported this policy, but we want to see allocated funds and a strategy to ensure low parking provision in new developments does not adversely impact neighbouring communities. Whilst there is policy relating to electric charging points for cars, it would be useful to include policy to make them accessible to the wider community, particularly where

the existing infrastructure may not provide the opportunity to put them elsewhere in the public realm.

### **CCS1: Climate change, sustainable design and construction**

We thought it was positive that more engagement with the community is sought and could potentially make large power stations and CHPs harder to gain permissions (particularly in areas of poor air quality). Connecting developments up to Bristol's heat network instead seems like a more positive step. A quantitative commitment to insulation levels or thermal performance would also be welcome here to cut down on thermal demand

### **CCS2: Towards zero carbon development**

We thought this policy could go further if Bristol is to become zero carbon by 2030. The reductions should be higher for carbon and energy use in general.

### **Retained policy DM15:**

There is also an opportunity here to improve policy on tree planting and the group were disappointed that this has not been upgraded. Improved levels of urban planting to combat poor air quality and promote biodiversity are sorely needed, especially in air quality management areas.

We have included a note below regarding an opportunity to join the Urban Tree Challenge Fund, which would provide additional funds for planting and establishment of trees in urban areas.

### **Policy DC2: Tall buildings**

We understand the purpose of this policy is to control developments of tall buildings. It is quite clear when it says:

“Tall buildings may be appropriate where they would contribute positively to the character and function of the urban environment. Proposals for tall buildings will be expected to demonstrate high quality design throughout their height to reflect their wider impact on the urban environment and skyline.

Tall buildings should not have a harmful impact by reason of:

- i. Creation of excessive shadowing and wind deflection or other harmful micro climate effects;
- ii. Unduly dominating impacts on adjoining buildings and the public realm; and
- iii. Inappropriate visual impacts over a wider area, including on the setting of heritage assets.”

“Proposals for tall buildings should be accompanied by sufficient information on which to assess their impact. It will not be possible to permit tall buildings where the required information has not been provided.”

“Landscape and Visual Impact Assessments will be necessary to enable the visual impact of tall buildings from near and distant viewpoints to be assessed. Accurate visual representations of the submitted scheme should be provided from key viewpoints agreed with the local planning authority. Information on local microclimate impacts should also be submitted, as a separate assessment or as part of the Design and Access Statement.”

The group was pleased that the policy places emphasis on realistic photographic renderings given recent planning applications at Bedminster Green.

There is no mention of the need to avoid masking topography that has been previously included in tall building policies, this should be reinstated to avoid harming views across the city.

The group felt that the policy should include this as poorly sited tall buildings have the potential for huge damage to the city which will be in existence for many years to come.

### **Omissions**

Additionally the group felt that the recent Adblock Bristol campaign for no new billboards within the city limits is worth supporting. In recent years applications have been sought for a number of billboards in the area, we understand from other groups and the campaign this is not unique to south Bristol. Particularly we feel that electronic, LED and lit billboards are unsuitable in residential areas where they may cause light pollution and disturbance at night. They cause damage to communities, the environment, are a needless waste of energy and damage the health of nearby residents.

We encourage the council to take advantage of the Urban Tree Planting Fund launched on May 23 2019. Details can be found at:

<https://www.gov.uk/guidance/urban-tree-challenge-fund>

Applications to this fund could help significantly improve the provided green infrastructure to new developments. It should not be used however as the only source of green infrastructure.