

URBAN LIVING SPD

Consultation Statement



City Design Group
Growth and Regeneration

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1. Introduction

The Urban Living SPD (consultation draft) can be found at:

www.bristol.gov.uk/urbanliving

together with the following supporting information:

- Learning from recent higher density developments (evidenc base)
- Draft Consultation Statement
- SEA and HRA Screening Opinion

This Consultation Statement describes the approach taken by Bristol City Council to engage and consult with individuals and organisations on the Urban Living Supplementary Planning Document (SPD). It outlines both the non-statutory consultation that took place during the pre-plan preparation stage, and then the formal consultation that took place on the draft SPD (19 February- 13 April 2018).

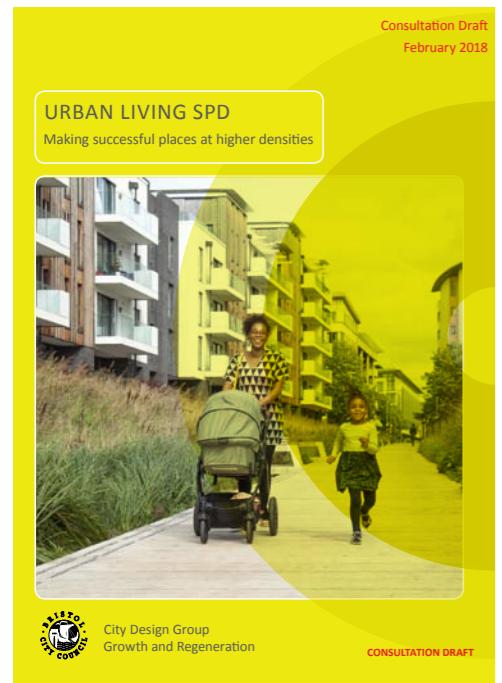
The Urban Living SPD was consulted upon in parallel to a separate consultation on the Issues and Options Paper of the review of the Bristol Local Plan. The Local Plan Review contains a number of new Urban Living policies, and the consultation feedback on these policies have been reviewed separately. It is anticipated that the Consultation Statement for the Local Plan Review will be available by late November 2018- early February 2019.

Bristol City Council has been pleased with the level of consultation feedback on the draft SPD. Respondents could respond in a variety of ways, and the level of response was as follows:

- Quick survey: 613
- Detailed survey: 185
- By email/letter: 145

The Consultation Statement summarises feedback received through the consultation. The range of issues touched on through the consultation has been broad. It has therefore not been possible to provide a response to all the issues raised. Instead, the key re-occurring issues have been highlighted in the back of the report, with an initial idea of how we are likely to respond as we draft the final publication of the report. Our responses have in part also been informed by the White Paper on the NPPF which was released for consultation in March 2018, and the Hackett Report (published May 2018). The intention is to update the SPD over the summer, with a target date for consideration by Cabinet of the 4 September 2018.

1. Introduction



1.1 Purpose of the Urban Living SPD

SPDs add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs can be considered as material considerations as part of the process of determination of planning applications.

The Urban Living SPD adds further detail to the policies in the existing Bristol Local Plan, and in particular policies BCS20 (Efficient and Effective Use of Land) and Policy BSC21 (Quality Urban Design).

Bristol's Local Plan is currently under review and will contain new policies on Urban Living (ULH3&4). On adoption of the Local Plan (anticipated 2020), the Urban Living SPD will provide further detail to these new policies.

On adoption, the Urban Living SPD will replace the existing SPD1 Tall Buildings (adopted 2005), which will remain in place until then.

1.2 Supplementary Planning Documents-consultation requirement

SPDs are not part of the development plan. As such, they are open to less scrutiny through the plan-making process than the Local Plan. The Town and Country Planning Regulations (2012) states that before a local planning authority adopt a supplementary planning document it must prepare a statement setting out—

- (i) the persons the local planning authority consulted when preparing the supplementary planning document;

(ii) a summary of the main issues raised by those persons; and

(iii) how those issues have been addressed in the supplementary planning document.

Bristol City Council's 'Statement of Community involvement' (2015) sets out Bristol's consultation expectations for a Supplementary Planning Document. It sets out three main stages in preparing an SPD:

Stage 1 – Preparation: Draft Supplementary Planning Document is prepared.

Stage 2 – Consultation on draft: Council publishes draft Supplementary Planning Document for public comments for minimum period of four weeks.

Stage 3 – Adoption: Final Supplementary Planning Document is prepared taking account of comments received at Stage 2. Document is presented for adoption at a meeting of the council's Cabinet.

1.3 Objectives of the Urban Living SPD consultation:

Public consultation took place from 19th February -13th April 2018. The objectives of the consultation and accompanying communications and engagement activities were to:

- Allow for non-statutory consultation at the preparation stage involving Bristol's planning, property and design communities;
- Use local precedent schemes to illustrate what is meant by Urban Living;
- Provide 7 weeks consultation period on the draft SPD (rather than the 4 weeks formally required)

- Collect feedback from stakeholders to refine the documents;
- Ensure a coordinated approach to consultation with the Local Plan Review, Issues and Options Paper, a similar timetable for responses being provided;
- Build awareness of the consultation using local press and social media, providing a short film in support of the consultation which illustrates a balanced and broad range of viewpoints;
- Provide convenient ways for people to get involved and give their feedback, both on-line and off-line;
- Monitoring national and local media stories/articles relating to higher density/tall buildings.

1.4 SEA Screening Determination

In accordance with the requirements of regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004, the Council has determined that this SPD should not be subject to a Strategic Environmental Assessment. This determination has been arrived at in agreement with relevant statutory consultees. A copy of the SEA Determination Letter and Statement of Reasons were published at the following location on 31st May 2018:

<https://bristol.citizenspace.com/growth-regeneration/urban-living/>

2. Preparation consultation

2.1 External Stakeholder Events

A decision was made to engage with key stakeholders early on in the pre-plan making process. This was in recognition of the high degree of interest in the issues surrounding urban living and a desire to explore some of the technical issues with an expert audience comprising Bristol's planning, development and design communities.

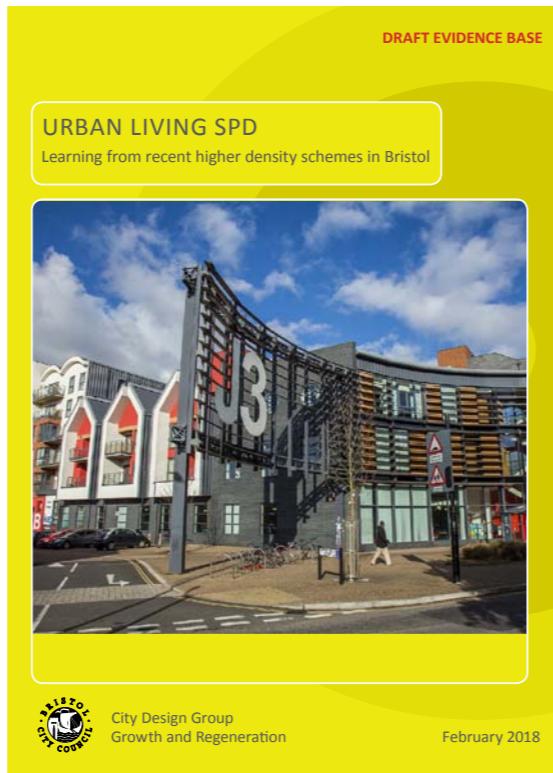
During the course of preparing the 'Urban Living SPD-Making successful places at higher densities' Bristol's planning, design and development community have been engaged through two formal consultation events.

- Launch Stakeholder Event- 16th March 2017
- Follow-up Stakeholder Event- 28th September 2017

Briefing sessions/information exchanges

A number of briefing sessions have taken place throughout 2017 which have provided further opportunities to test emerging thinking, and explore a range of perceptions.

- Bristol Property Agents – 16 October 2017
- Core Cities Planning Group – 3 March 2017
- Homes West – 21 September 2017
- Neighbourhood Planning Network – April 2017, 10 October 2017
- South Gloucestershire Strategic Planners – 22 August 2017, 31 October 2017
- Urban Design London – 2 May 2017



Companion Document: Urban Living- Learning from recent high density development

Accompanied site visits

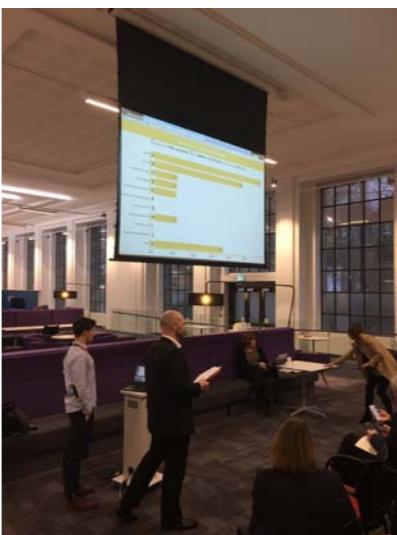
In support of the preparation of a companion document to the Urban Living SPD, '**Urban Living- Learning from recent high density developments**' a number of accompanied site visits were made, set out below:

- Wapping Wharf – 10 May 2017
- Finzels Reach – 28 April 2017
- Paintworks – 10 May 2017
- Junction 3 – 27 April 2017
- Keynsham Civic Centre – 27 April 2017
- Burgess Salmon Office, Temple Quay – 27 April 2017
- Gainsborough Square – 20 April 2017
- Southmead Hospital – 3 May 2017
- Filwood Business Park – 20 April 2017
- One Bristol, Lewin's Mead – 9 May 2017



Photo: Chris Bahn

2. Preparation consultation



Photos from consultation event held at City Hall 16 March 2017

Launch Stakeholder Event – 16 March 2017

On the 16 March a stakeholder event was held in the Cash Hall at City Hall, which was attended by over 60 stakeholders. These were invited stakeholders from Bristol's planning, design and development communities (see appendix a).

The event consisted of an introductory presentation from the Exec Member, followed by an overview of our emerging thinking from the Head of Planning. There was then an opportunity for group discussions.

The key findings are set out on the following page.

5.15pm	Welcome Councillor Helen Holland - Cabinet Member for Place, Bristol City Council
5.20pm	Setting the scene Zoe Willcox, Service Director – Planning, Bristol City Council
5.40pm-7pm	Discussion Chaired by Barra Mac Ruairi – Strategic Director Place, Bristol City Council Quick Poll 1 (5 mins) Group Discussions (35 mins) Based on your experience of delivering, designing, or assessing higher density development in Bristol to date..... Q1. What could and should the new guidance cover? Q2. What has to change in the system to enable us to achieve higher quality development? Reporting back (25 mins) Quick Poll 2 (10 mins) Closing comments

Urban Living SPD – Themes emerging from initial scoping event

16 March 2017

It is important that the Urban Living SPD is informed by a thorough understanding of context. This should cover the whole city and include: views in and out of the city; historic growth of city; heritage assets; topography; movement and accessibility; capacity of existing areas/communities for change.

New guidance needs to provide greater clarity on the areas considered suitable for higher density development. The City's transport hubs, radial routes and city centre are obvious foci. Less obvious opportunity areas in the south and east of the city, should be proactively explored through spatial frameworks.

Design guidance needs to be informed by existing best practice. Wapping Wharf and Paintworks were identified as good local examples of higher density mixed use developments. We should also learn from the experience of other UK cities, particularly London which has been grappling with these issues for longer.

Design guidance needs to clearly set out what is being sought from higher density development, without being overly prescriptive. Potential topics include: efficient site planning; privacy distances; daylight requirements; single/dual aspect apartments; private and communal open space (courtyards, balconies, winter gardens, roof gardens); public realm design including the role of the natural environment; mixing of uses; active frontages; car parking approaches/storage; and servicing development.

A greater focus is required on building new high density developments that better integrate into the wider neighbourhood. This will involve greater community consultation at an earlier stage to establish local aspirations, concerns and need, and a greater recognition that higher density development places significant pressure on existing community infrastructure such as GP surgeries, public transport and public open space.

Guidance needs to positively say where tall buildings will be encouraged whilst setting out their limitations in terms of delivering affordable housing, using land more efficiently and delivering successful placemaking. Assessment criteria will still be required.

Bristol City Council needs to be more proactive about promoting higher density, higher quality development. This could be achieved through the adoption of a more positive and collaborative planning role, informed through a deeper understanding of local need and market deliverability. It could also be achieved by leading by example in the development of its own land and securing funding to deliver supporting infrastructure.

2. Preparation consultation

Follow-Up Stakeholder Event – 28 September 2017

On the 28 September a follow-up stakeholder event was held. Again this was in the Cash Hall at City Hall, and was attended by over 60 stakeholders. These were invited stakeholders from Bristol's planning, design and development communities.(see appendix b).

The event consisted of a series of presentations followed by group discussions.

5-5.15pm	Arrival, signing in, tea and coffee
5.15pm	Welcome/short film Councillor Nicola Beech, Cabinet Member for Spatial Planning and City Design, Bristol City Council
5.25pm	Urban Living SPD – Recap on our initial thinking Zoe Willcox, Service Director – Planning, Bristol City Council
5.35pm	Urban Living SPD – Baseline studies Julie Witham, City Design Group, Bristol City Council
5.55pm	Creating successful communities at higher density Sarah McQuatt & Jayne Whittlestone, United Communities
6.10pm-7pm	Workshops (40mins) First session: Learning from recent higher density schemes Second session: Understanding context/exploring opportunities Reporting back (10 mins)



Photos from consultation event held at City Hall 28 September 2017

Urban Living SPD - Summary of themes and feedback from follow-up event:

28 September 2017

General:

Generational and megatrends- there is a need to take a strategic approach to the document and provide adequate future-proofing in response to long-term, generational changes in attitude to issues including:

- Car ownership, storage and use.
- Tenure
- Type and provision of private amenity space
- Flexibility and adaptability of accommodation typologies.

Quality of public and private realm-

- Vibrant, successful places are where street life thrives, with comfortable microclimate and space for activities to occur.
- Both public and private space needs to have a clearly defined function and be appropriately designed for that function. For example providing childrens' play, quiet spaces etc.

Community Focus-

- Bristol is at its best when its community focussed. Therefore new development needs to support mixed and balanced communities and respond to existing community needs.

Density-

- Still difficulty in defining a consistent method which will allow for a genuine comparison of schemes.
- Should not let this be the defining measure of assessment; focus should be on design quality and integration into an area.
- Importance of understanding relationship between gross and net densities on the character of areas. Should not be seeking to increase densities to the detriment of open space etc.

SPD-

- Generally felt that there is a lot of existing guidance. The SPD should not repeat or duplicate this information, rather signpost to relevant documents.
- Clear assessment criteria and template considered to be positive for all involved parties.
- Proactive promotion of sites for higher density to provide some certainty for developers and investors. Need to manage vision for and aspiration for more outlying areas to encourage a more intense use of sites.

Case Studies:

- Generally well chosen.
- Could draw out other lessons from aspects other than design and location.
- Should include a tall building example.
- Could draw on other existing guidance- CABE, RIBA, AoU etc.

Locational Guidance:

- General consensus around transport nodes and public transport routes, although need to ensure existing infrastructure has capacity for intensification.
- PIWAs- for both intensification of employment use and introduction of high density residential.
- No specific objections to the locations shown on the plan. Additional locations identified including early 20th century estates for intensification – Lawrence Weston, Southmead, Shirehampton, Filwood etc.
- Any specific locations need to be informed by city-wide analysis and character assessment.

3. Statutory consultation on draft

3.1 Notification and Publicity

The statutory consultation on the draft Urban Living SPD was formally launched on 26th February 2018 for 7 weeks, closing on 13th April.

A range of methods were used to ensure that relevant individuals and organisations were made aware of the consultation and ways of giving their feedback.

A press release was published on 1st March 2018 by the City Council Newsroom and promoted across the City Council's social media.

Stakeholder Organisations

A number of stakeholder organisations were drawn from the Local Plan Consultation Database and Neighbourhood Planning Network including:

- Community and neighbourhood groups
- Planning Agents and Architects with interests in the area
- Heritage groups
- Environment and Ecology groups
- Transport groups
- Business groups

Letters were sent to all identified stakeholder organisations on February 20th, inviting comments on the draft Urban Living SPD (See Appendix XX). These letters contained links to both online surveys as well as providing contact details for those wishing to send letter/ email responses to the consultation.

Wider Public

The main portal for information about the consultation was Bristol City Council's citizen space consultation hub. This page had digital versions of the Draft Urban Living SPD and companion document Urban Living- Learning from recent higher density development.

Links to both the Quick and Detailed Survey were also provided, together with contact information for people to respond by email or letter.

3.2 Consultation Materials

Film

A short film was also prepared to accompany the consultation information and was made available through the Council's social media and consultation hub web page. The film received 396 views and is available at the link below:

<https://www.youtube.com/watch?v=gi9SzpBw4YE>

Printed documents

50 copies of the Draft Urban Living SPD were printed. One copy was sent to each library within Bristol, with a letter attached signposting how to respond to the consultation.

Other copies were brought to consultation events. One copy was supplied to the Architecture Centre.

Surveys

In order to gauge views from as wide an audience as possible two surveys were prepared: a quick survey and detailed survey.

The quick survey was designed to gauge general views on higher density development and tall buildings. The 9 questions did not require respondents to have read the entire SPD and was largely targeted at the general public.

The detailed survey was targeted at those who had read the entire Urban Living- Making successful places at higher densities consultation draft SPD and asked 10 specific questions related to the general design principles for higher density developments (including tall buildings), location of a number of 'Urban Living' focal areas, proposed new residential quality standards and assessment guidance for applicants. This provided the opportunity for those involved in the development industry and other interested parties to comment more fully on the detailed proposals.

3.3 Level of response/details of respondents

Bristol City Council has been pleased with the level of consultation feedback on the draft SPD. Respondents could respond in a variety of ways, and the level of response was as follows:

- Quick survey: 613
- Detailed survey: 185
- By email/letter: 145

We were particularly pleased with the level of response to the detailed survey, which first required respondents to read the SPD first before answering specific questions about the document.

Respondents identified themselves as follows:

Quick survey – 9% professions/13% amenity or community planning groups/77% neither

Detailed survey – 31% professionals/27% amenity or community planning group/42% were neither

Letters: 1/3 Bedminster residents-remaining professional audience

3. Statutory consultation on draft: Quick Survey

Survey Feedback: Quick Survey

Purpose and Scope

The quick survey was designed to gauge general views on higher density development and tall buildings. The questions did not require respondents to have read the entire SPD.

The survey asked 9 questions related to the key themes of the SPD. Respondents were able to choose which questions to provide feedback on, therefore the following outlines the feedback received from completed submissions.

Who responded?

The quick survey received a total of 665 responses, with 42 partial and 623 completed responses. Of the respondents that answered 91% (560 respondents) live in Bristol, with 8% (46 respondents) working in Bristol and 1% (6 respondents) neither live nor work Bristol.

Of the respondents that answered 9% (59 respondents) are professionally involved in the development sector, 13% (81 respondents) are a member of an amenity group or community planning group that is actively involved in planning matters and 77% (485 respondents) are none of the above.

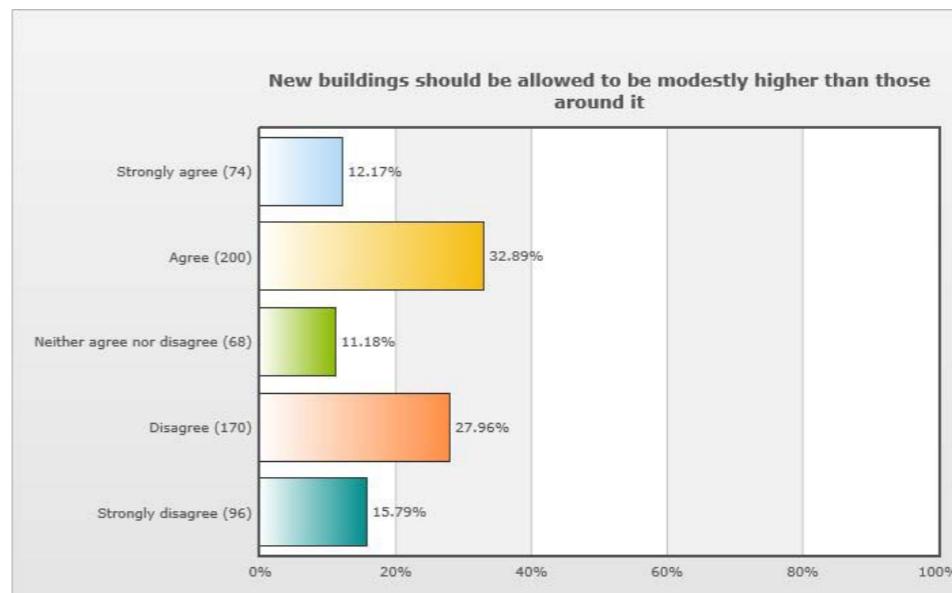
Of the respondents that answered there was a 50% female/ 42% male split, with 8% preferring not to say. The majority of respondents were aged between 25-44 forming 39% of response with 45-64 age group forming 35% of responses.

The majority of respondents who provided a postcode were from the Bristol area (37% from Bedminster), with 1 respondent from Bath, 1 from Gloucester and 2 from Berrow.

Summary of responses:

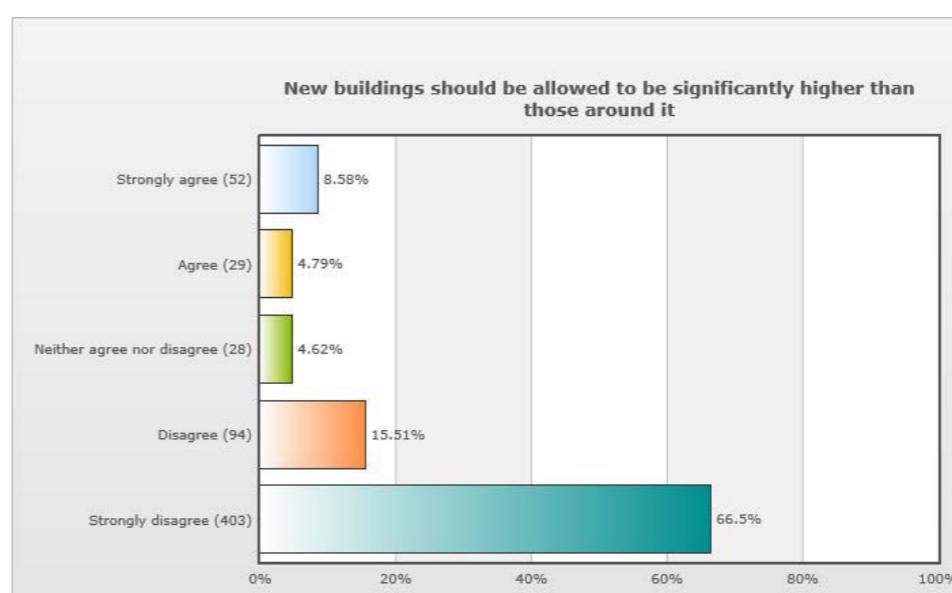
- 50/50 split between respondents agreeing/disagreeing on whether new buildings should be allowed to be modestly higher than those around it.
- Clear majority strongly disagreed that new buildings should be allowed to be significantly higher than those around it.
- The majority agreed that new building heights should reflect the prevailing building height of those around it.
- Support for the locations proposed for higher density development ranged from 24% (local and district centres) to 58% (large vacant sites), with areas close to existing and proposed transport hubs receiving the second and third highest level of support (47-55%).
- There was strong support for new apartment blocks to be designed for a mix of residents, regardless of their age, family composition, tenure etc.
- There was strong support for new residential development being primarily delivered in low and mid-rise developments, rather than high rise tower blocks.
- There was strong disagreement that Bristol should extensively promote high rise tower blocks to meet its housing need.
- A clear majority agreed that residential units should have access to private external space.
- There was strong support for only allowing significantly higher density development in neighbourhoods where the local infrastructure can support it.

Question 1



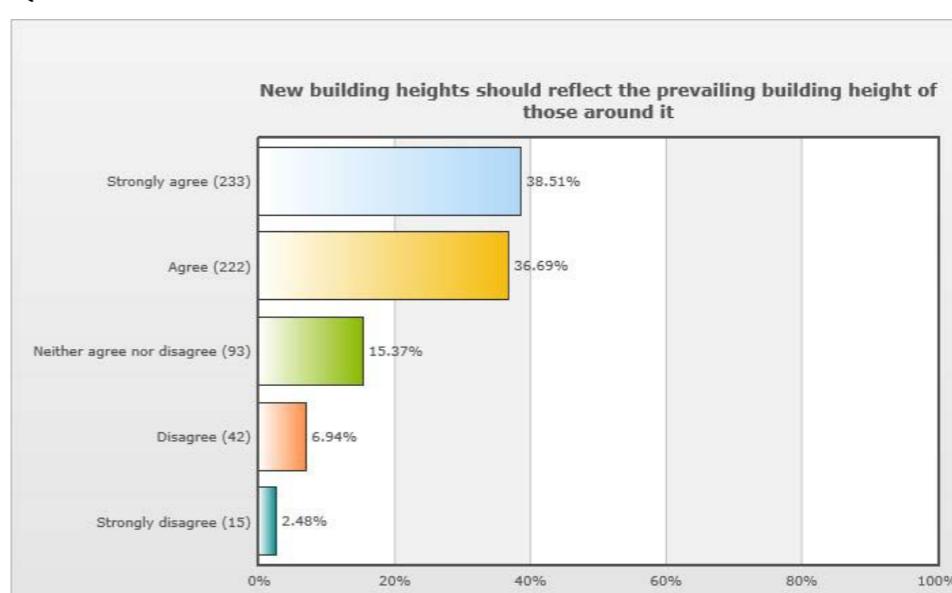
Responded: 608 Skipped: 15

Question 2



Responded: 606 Skipped: 17

Question 3

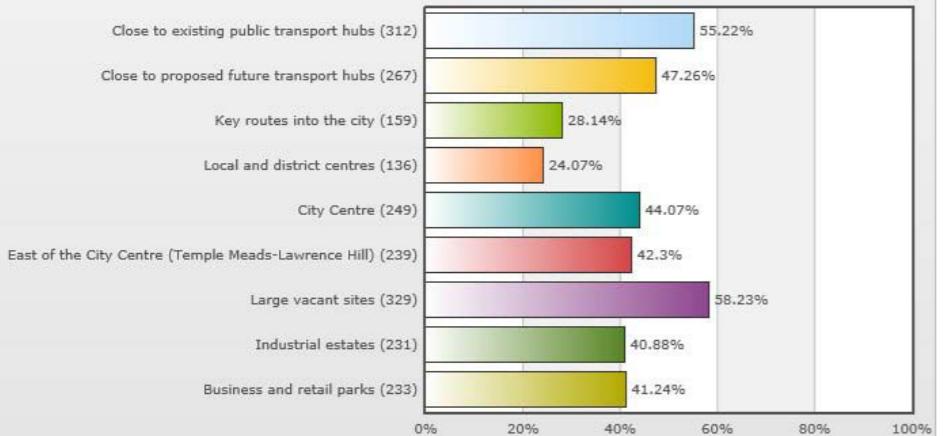


Responded: 605 Skipped: 18

3. Statutory consultation on draft: Quick Survey

Question 4

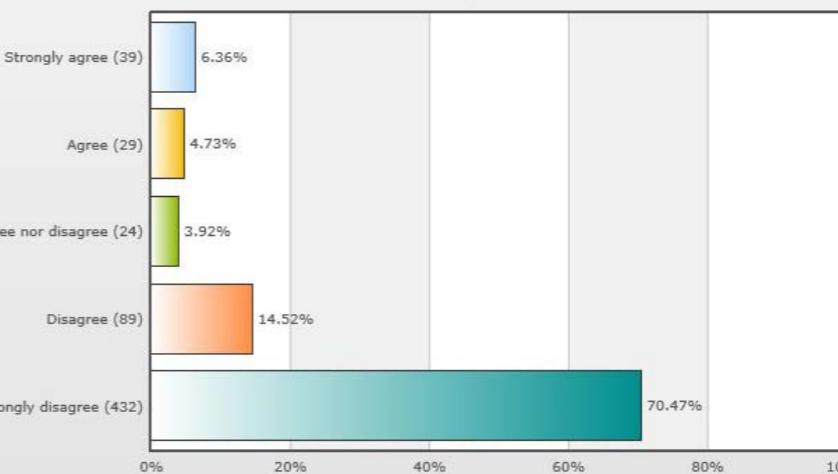
Where in the city do you think we should be promoting higher density buildings (for housing, retail and employment)? Tick all that apply



Responded: 565 Skipped: 58

Question 7

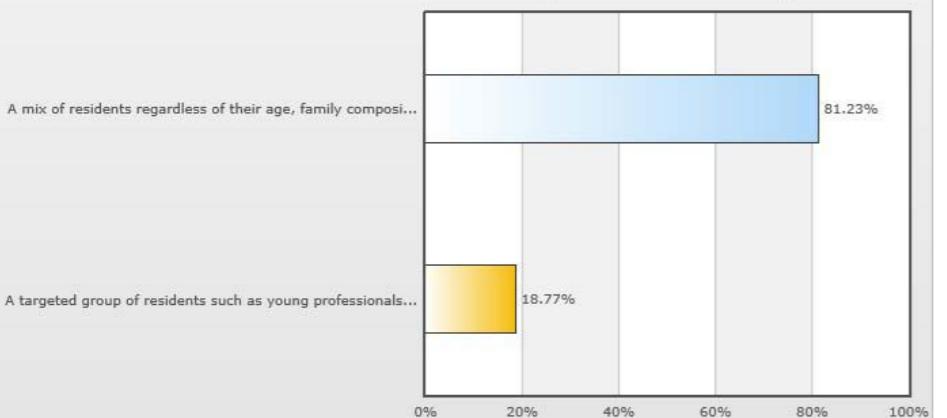
Bristol should extensively promote high rise tower blocks to meet its housing need



Responded: 613 Skipped: 10

Question 5

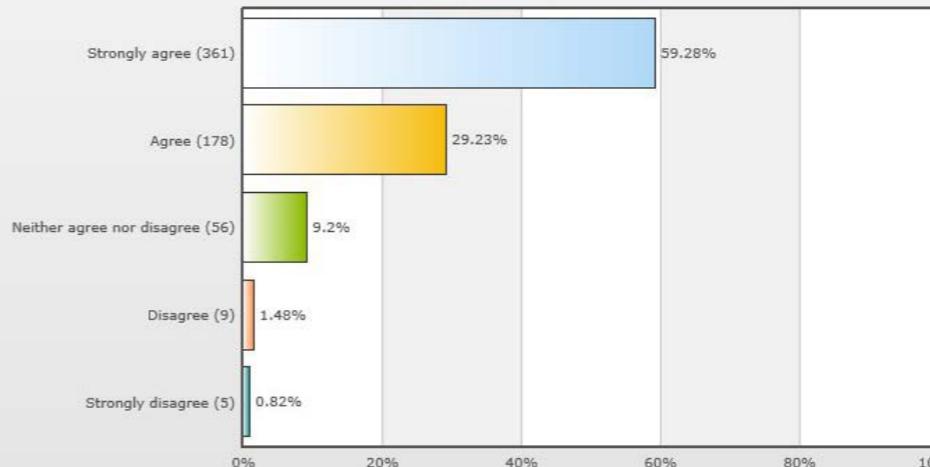
Bristol has to build 33,500 new dwellings over the next 20 years. Inevitably a large proportion of dwellings will be apartments/maisonettes. Should apartment blocks be designed for:



Responded: 602 Skipped: 21

Question 8

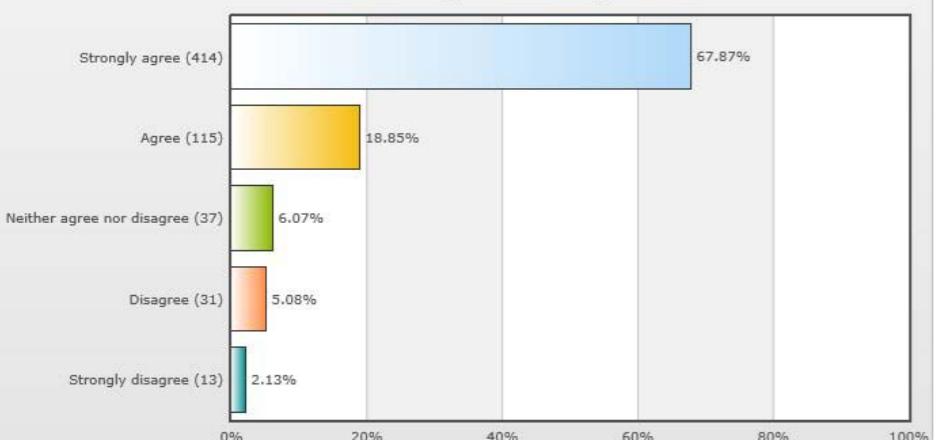
Residential units should have access to private external space (balcony, garden or roof terrace)



Responded: 609 Skipped: 14

Question 6

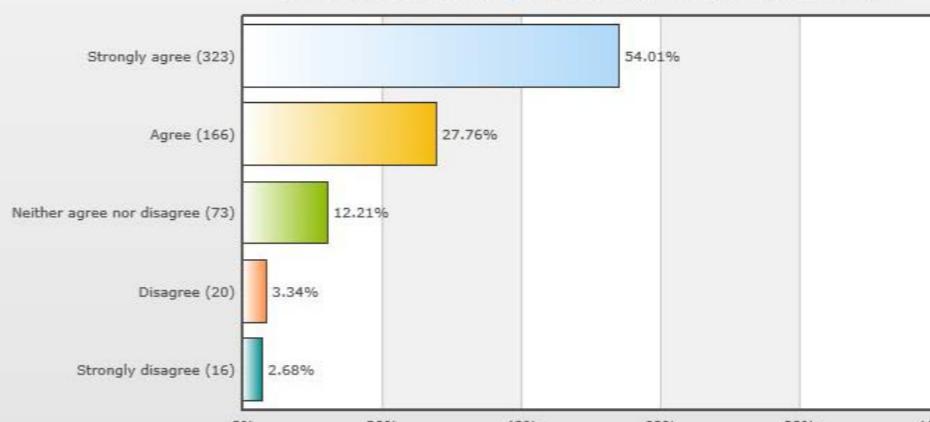
New residential units should primarily be provided in low and mid-rise developments (places like Wapping Wharf, Paintworks, Junction 3) rather than high rise tower blocks



Responded: 610 Skipped: 13

Question 9

Significantly higher density apartment blocks should only be allowed in neighbourhoods where the local infrastructure can support it (transport, schools, open space etc.), unless the scheme can help the neighbourhood address some of these problems



Responded: 598 Skipped: 25

3. Statutory consultation on draft: Detailed Survey

Survey Feedback: Detailed Survey

Purpose and scope

Targeted at those who had read the entire Urban Living- Making successful places at higher densities consultation draft SPD.

Asks 10 specific questions related to the general design principles for higher density developments (including tall buildings), location of a number of 'Urban Living' focal areas, proposed new residential quality standards and assessment guidance for applicants.

Respondents were able to choose which sections of the document they wished to give their feedback on, including free text sections at the end of each question.

Therefore the following sections outline the feedback received question by question and includes a summary of the free-text responses provided.

Who responded?

The detailed survey received a total of 185 responses, with 110 partial and 75 completed responses. Of the respondents that answered 84% (52 respondents) live in Bristol, with 11% (7 respondents) working in Bristol and 5% (3 respondents) neither live nor work Bristol.

Of the respondents that answered 31% (22 respondents) are professionally involved in the development sector, 27% (19 respondents) are a member of an amenity group or community planning group that is actively involved in planning matters and 42% (29 respondents) are none of the above.

Of the respondents that answered there was a 32% female/ 52% male split, with 16% preferring not to say. The majority of respondents were aged between 25-44, forming 41% of responses.

All respondents who provided a postcode were from the Bristol area, the majority from Bedminster forming 49% of responses, with one exception from London.

Summary of responses:

- The majority of respondents supported the aspiration to optimise densities, by balancing the more efficient and effective use of land, with an aspiration for successful placemaking, liveable homes and a positive response to context.
- The majority of respondents supported the aspiration to modestly increase densities within most areas of Bristol and significantly increase densities in identified Urban Living focal areas through a design-led approach, with a spatial plan being prepared for areas of anticipated change. However there were concerns that the design-led approach to determine the level of change needs to precede the identification of areas for significant intensification (see Q2 detailed response summary).
- The majority of respondents supported a minimum net density of 50dph, except where densities below this are essential to safeguard the special interest and character of the area, and an upper threshold, expressed as Hyper-density, over which development would be discouraged and subject to much more rigorous impact testing. However

the majority of respondents did not agree with the upper threshold limit of 350dph, citing a lower density threshold around 200-250dph in central areas.

- The majority of respondents supported the introduction of a number of Residential Quality Standards, with every standard receiving a high percentage of support.
- The majority of respondents strongly disagreed with the aspiration to encourage tall buildings, while there was no clear result with regard to the definition of a tall building (of 10+ residential storeys) with a slight bias to disagree with the definition (27.12%).
- The majority of respondents supported the aspiration to require applicants to use a number of new checklists and considered that this would provide greater clarity on what is expected in support of a planning application.
- The majority of respondents supported the aspiration to require additional scrutiny for all tall buildings and major residential developments. However a large percentage of respondents did not agree with the thresholds as currently proposed: 150phd in a suburban setting, 200dph in an urban setting and 350dph in a central area, citing that these thresholds were generally too high.
- The majority of respondents agreed that the future maintenance and management of schemes should be considered at planning stage. A number of respondents commented on what the scope of a Management practice note should include, with general themes related to affordability

of management/service charges, maintenance and management of communal spaces, life cycle costs and monitoring the impact within the neighbourhood (see Q8 detailed response summary).

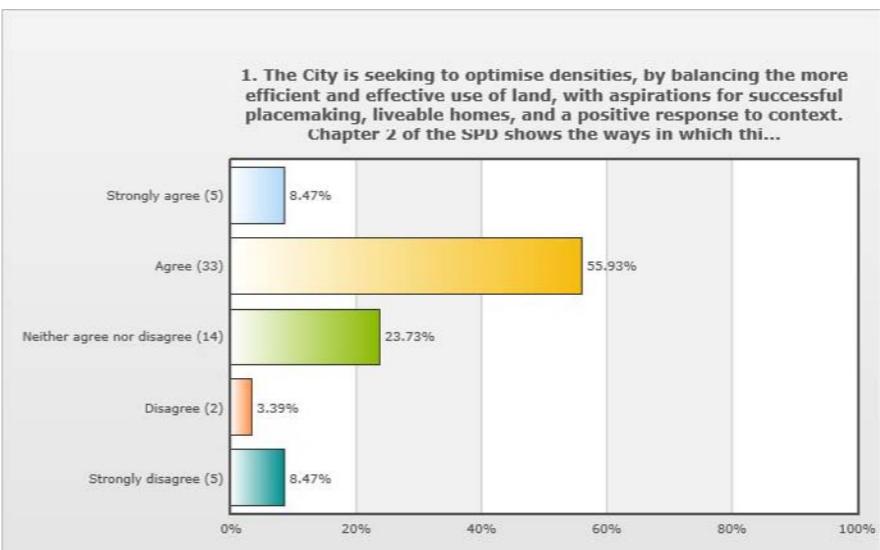
- A number of respondents commented on the document 'Urban Living- Learning from recent higher density developments', with most supporting the idea of using case study review to inform the SPD and the choice of case studies used. However the majority highlighting the need to expand the remit of the document to included other UK core cities and European examples. It was also commented that the document could have included more studies of tall buildings.
- A significant majority of respondents thought the document should be retained as a single document, rather than split into 2 parts: 1) introduction, Design Guidance, Quality Standards and Tall Buildings; 2) Guidance on Planning Applications and Assessment Criteria.

3. Statutory consultation on draft: Detailed Survey

Key Issues emerging from Detailed Survey

- 1 Strong objection to the promotion of tall buildings to meet housing need from visual, social and environmental perspective.
- 2 General support for the Urban Living 'Focal area' approach based on the principles set out, but concern that the areas highlighted are not clearly an output of this, and need to more clearly set out anticipated level of intensification (based on a more robust analysis of existing infrastructure and facilities)
- 3 Strong objection to development of up to 350dph in the Bedminster area.
- 4 Support for a Hyper-density threshold, but at a lower density than the 350dph currently proposed in the central area and lower again for urban and suburban areas.
- 5 General support for Residential Quality Standards, but evidence base challenged and some critics suggesting some are too specific and may hinder desired higher density development.
- 6 Not enough emphasis on green and blue infrastructure within both public and private realm, concern that higher density development will fail to deliver enhancement without stricter guidance.
- 7 Criticism that the document doesn't provide adequate assessment of context to support and justify location based guidance (e.g. Conservation areas, PIWAs etc).

Question 1:



Response: 59 answered 16 skipped 48 Extended answer

59 Respondents chose to share their opinion on the aspiration to optimise densities, by balancing the more efficient and effective use of land, with aspirations for successful placemaking, liveable homes and a positive response to context, with a clear majority supporting this aim.

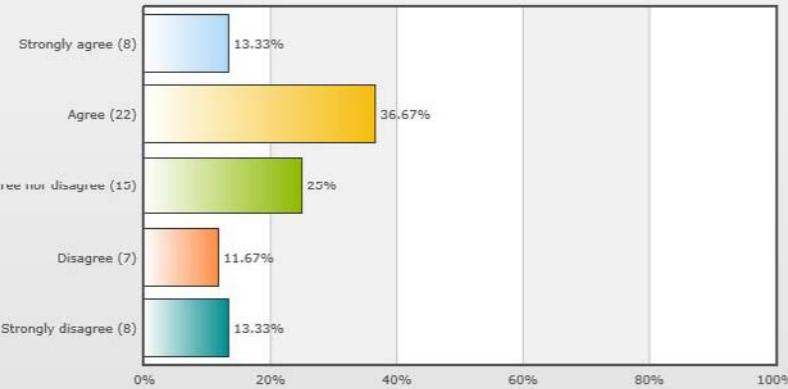
48 Respondents provided additional comments related to the design guidance. Those that responded in support of the general aspiration generally cited concerns with regard to:

- The enforceability and deliverability of the standards and guidance
 - The need for a plan-led approach to densification in 'Urban Living' focal areas in advance of areas development coming forward, with many citing the need for masterplans
 - The inferred link between higher density development and high rise buildings, with the majority of respondents referring to evidence that mid-rise forms produce high densities
 - The majority of respondents were not supportive of the promotion of tall buildings
 - Those that were not totally opposed to tall buildings were concerned the guidance was not sufficient to guide the siting of tall buildings
 - Some respondents expressed concern that the principles set out did not relate to the subsequent identification of Urban Living focal areas; notably areas referred to included Bedminster and Cumberland Basin, with other respondents suggesting the need for a 'graded' approach to the level of intensification in an area (reference made to Fishponds and Henbury)
- Those that responded who were not in support of the general aspiration cited anecdotal evidence that most people want/ need more living space by way of building more bungalows, larger flats and houses that have a garden.
- A number of respondents provided specific comments on the design guidance, with general themes including:
- Green and blue infrastructure- more information and greater emphasis required on how higher density development should incorporate and support the city's existing assets and support resilience to climate change. Reference also made to the inclusion of Active Design
 - Sustainability-Greater emphasis on sustainable lifestyles which denser living supports.
 - Car parking and ownership- several respondents stating that car-free development should be promoted in the central area.
 - Student accommodation- guidance should consider other forms of residential provision including student accommodation and PRS.
 - City wide context analysis- several respondents commented that the guidance was not sufficiently informed by the Bristol context and did not make reference to other policies such as PIWAs and Conservation Areas.
 - Tall buildings- as above. Some respondents stating the guidance is not sufficient to replace current SPD1.

3. Statutory consultation on draft: Detailed Survey

Question 2:

2. The City believes that opportunities exist to modestly increase densities within most areas of Bristol and has additionally identified a number of 'Urban Living' focal areas which are considered to have the potential to significantly increase dens...



60 Respondents chose to share their opinion on the aspiration to modestly increase densities within most areas of Bristol, and significantly increase densities in identified Urban Living focal areas through a design-led approach, with a spatial plan being prepared for areas of anticipated change. The majority of respondents support this aim.

51 Respondents provided additional comments related to the proposed 'Urban Living' focal areas. Those that responded in support of the general aspiration generally commented in support of:

- Focusing development near transport hubs, with the level of density to be informed by the existing and proposed capacity of services (Parson Street and Bedminster train stations cited as examples of where services would need to be significantly improved to support an intensification of density).
- Redeveloping low density industrial areas, particularly to the east of the city.

Those that disagreed with the proposed focal areas generally cited concerns related to:

- Greater evidence and analysis of the capacity of facilities in proposed areas.
- Increasing densities should be directed by masterplans in advance of development proposals coming forward.
- Significant concern about the inferred link between areas identified for higher density development and subsequently suitable locations for tall buildings.

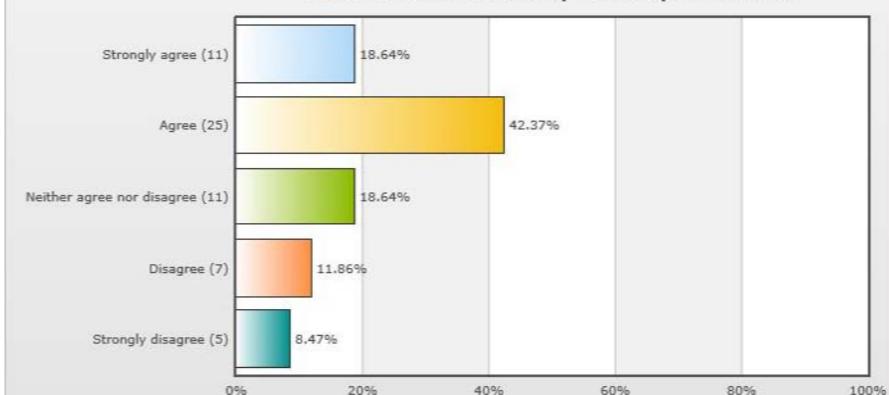
Response:

60 answered

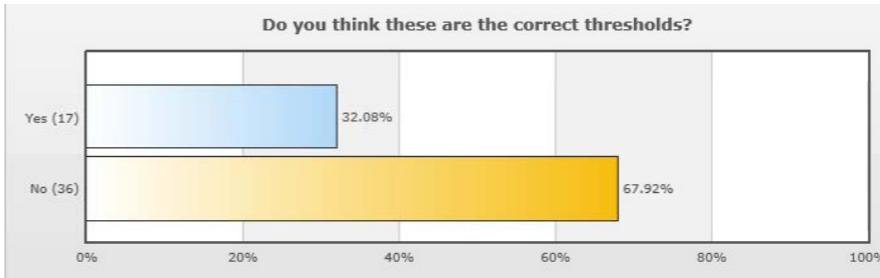
15 skipped

51 Extended answer

Question 3: 4. The City is keen that all new residential development achieves a minimum indicative net density of 50 dwellings per hectare (net). Net densities below 50 dwelling per hectare should only occur where it is essential to safeguard the special inter...



Response: 59 answered **16** skipped



Response: 53 answered 22 skipped 41 Extended answer

59 respondents chose to share their opinion on the aspiration to achieve a minimum net density of 50dph, except where it is essential to safeguard the special interest and character of the area, and to discourage 'Hyper-density' (above 350dph). The majority of respondents supported this aspiration.

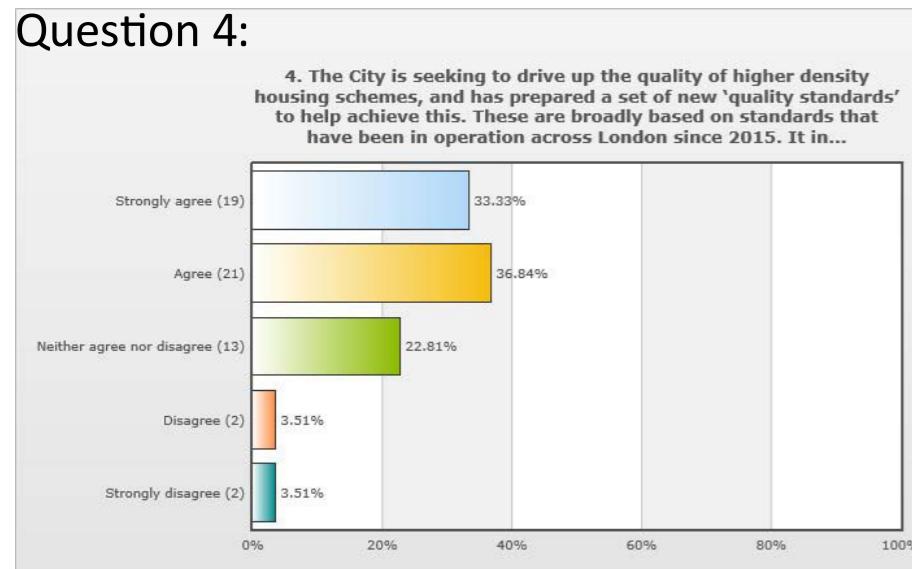
53 respondents provided views as to whether the thresholds proposed were correct. The majority disagreed with the 'Hyper-density' threshold, suggesting that a figure around 200-250dph. Although some respondents suggested there wasn't a need to set an upper limit.

There was general support for the minimum 50dph threshold, with only a few exceptions suggesting this should be lower. There were also comments to allow for additional exceptions to the minimum threshold related to other forms of housing, such as co-housing, which typically results in lower densities, but provides other advantages for residents.

A number of respondents commented that the main determinant of density should be the site characteristics and local context and not simply an arbitrary application of thresholds.

3. Statutory consultation on draft: Detailed Survey

Question 4:



57 respondents chose to share their opinion on the aspiration to introduce a series of 20 'quality standards', including a new standard on the provision of open space. There was strong support for this, with a majority of 70% .

Every standard received a clear majority of support, with particularly high levels of support for Standard 5 (93.6%), Standard 6 (91.5%) and Standard 12 (91.8%).

45 respondents chose comment further on whether any of the standards need redrafting, with key themes highlighted below:

- General language is unclear if the standards are mandatory or guidance and how they will be enforceable.
- Some respondents commented that the standards were overly prescriptive and could hinder the delivery of higher density schemes.
- Others commented that the evidence base and justification is not clear to support the standards as proposed.
- More emphasis on the provision of public space as part of development, as well as private and communal space within a development.

Standard specific comments are set out below:

- Standard 1- General consensus that amount of open space could be increased. Majority of units should have direct access to private space. Full height opening windows could be an option if outdoor private space cannot be provided.
- Standard 18- Some north facing apartments can be ok where there is good outlook, with pleasant views and the properties are well insulated.
- Standard 19- Requires clearer criteria
- Standard 20-Requires clearer criteria and should address under heating as well as overheating. Could make stronger references to low carbon energy.

Response:

57 answered

18 skipped

45 Extended answer

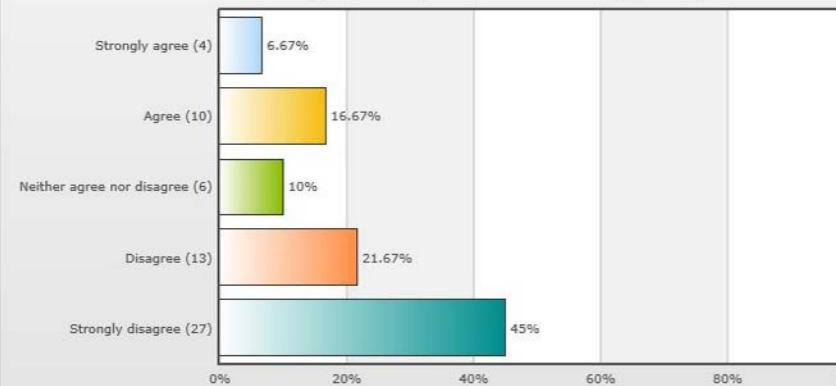
33 respondents choose to provide comments on whether any additional standards were needed, with key themes set out below:

- Standards related to sustainability of buildings- such as insulation and use of renewable energy, passive heating, water capture
- Standards more specifically related to the provision of green infrastructure and SUDs both in the private and public realm.
- Standards for the provision of public open space and sports facilities to be provided off site, if it cannot be accommodated within the development.
- Standards to apply to student flats, build to rent and cluster flats and in private residential to guide mix of units.

3. Statutory consultation on draft: Detailed Survey

Question 5:

5. The City is seeking to encourage tall buildings, built in the right locations and to a high quality of design. Chapter 4 of the SPD provides a revised definition of tall buildings (30m or taller – approximately 10 residential storeys), and provide...



Response: 60 answered 15 skipped 50 Extended answer

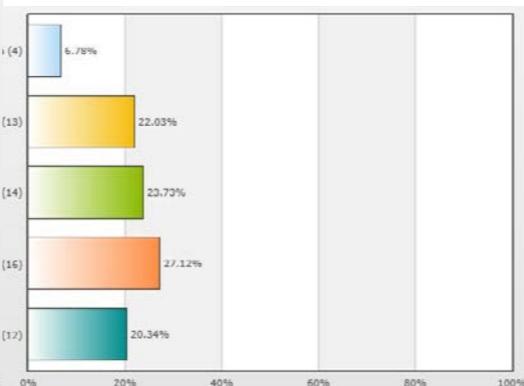
60 respondents chose to share their opinion on the aspiration to encourage tall buildings, built in the right locations and to a high quality of design. The majority of respondents disagreed with this aspiration, with 45% strongly disagreeing.

59 respondents chose to share their opinion on the definition of a tall building at 10 residential storeys (30m), with a slight majority disagreeing with this definition.

50 respondents chose to provide further comments on what could be added to the guidance of siting a tall building, promoting design excellence or achieving a sustainable design. The majority of respondents disagreed with the aspiration to encourage tall buildings and so the general tone of comments reflect this, with key issues set out below:

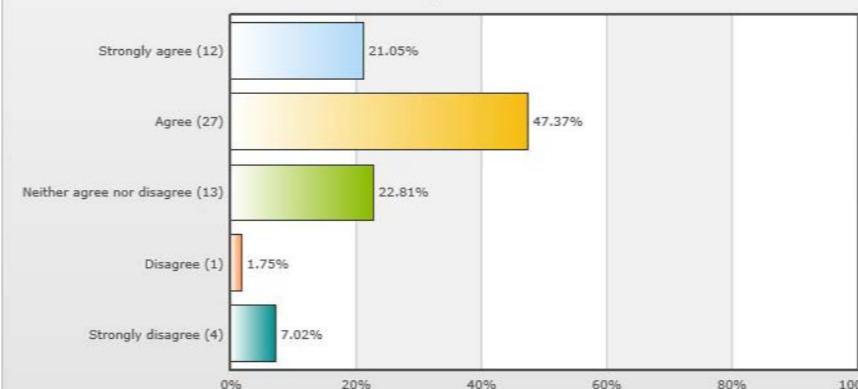
- Concerns about the social, health and wellbeing impacts of living in tall buildings, with respondents citing research indicating a number of negative effects including: increased levels of stress and mental health issues, affecting both adults and children, poor social outcomes (even when socio-economic conditions are comparable), increased crime and fear of crime.
- General concerns about the function and liveability of tall buildings such as the provision of private space and access to communal space.
- Expense of building tall makes them less likely to deliver affordable homes and so fails to deliver mixed and balanced communities.
- Concern over impact of tall buildings on both local

Do you agree or disagree with the definition of a tall building provided?



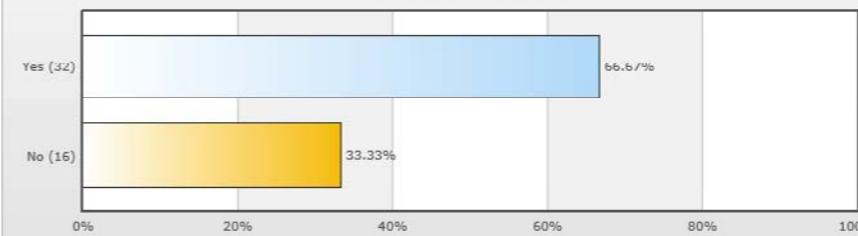
Question 6:

6. The City is keen to provide clarity to developers and other stakeholders on submitting a planning application for a higher density or taller building. Applicants are encouraged to more fully utilise their Design and Access Statements to describe t...



Response: 60 answered 15 skipped 50 Extended answer

Do you think the checklists provided do clarify what is expected in support of a planning submission?



Response: 48 answered 27 skipped

57 respondents chose to share their opinion on the proposed use of three new checklists to support planning applications for higher density or taller buildings. The majority of respondents agreed with this aspiration, with 60% of respondents considering this would clarify what is expected in support of a planning submission.

36 respondents chose to provide additional comments on the checklists, with key themes set out below:

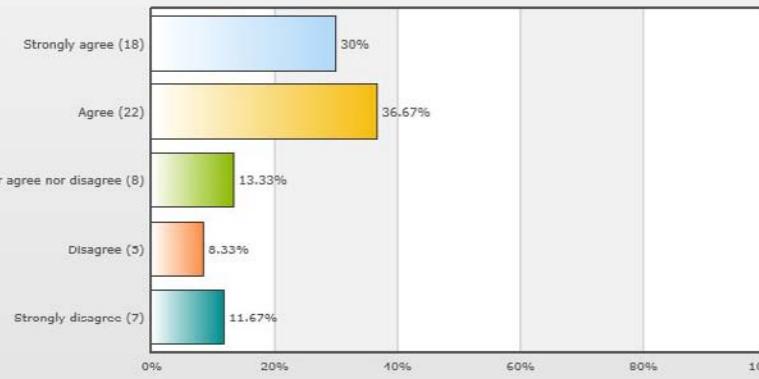
- Checklists are a good idea, but how will these be monitored and enforced if applicants do not provide the information requested?
- Suggestions for inclusion: amount of green space provided, walking distance to nearest green space, distance to nearest cycle route, SUDs, life cycle study/ change of use study, existing/ prevailing building height.
- Suggested that measures are shown as a percentage, as well as number of units.
- Reference to design review is supported, but should not specify a particular panel.

- Further guidance should be provided on what is expected from developers to meet requirement for thorough and effective consultation.
- Some of the information required by checklist 1 should already be included in a planning application.
- It is not clear if all the criteria must be met in the positive, if a scoring matrix is to be used, if it will be weighted and what weighting might be.
- Checklist 3 is not adequate to fully assess tall buildings.
- Support for better use of Design and Access statements and recommendations that these become approved planning documents

3. Statutory consultation on draft: Detailed Survey

Question 7:

7. The City is keen that all applications for tall buildings, should be subject to additional scrutiny, as well as major residential developments that exceed the following thresholds: more than 150 units/ha in a suburban setting; more than 200 units...

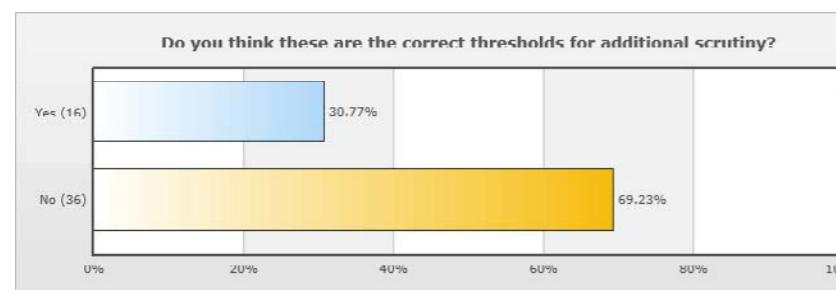


Response:

60 answered

15 skipped

43 Extended answer



Response: 52 answered 23 skipped

60 respondents chose to share their opinion on the aspiration to require additional scrutiny of major residential developments that exceed 150dph in a suburban setting, 200dph in an urban setting or more than 350dph in a central area setting. The majority of respondents agreed with this aspiration, but 70% of respondents did not agree with the thresholds set out.

The majority of respondents considered that the threshold in each setting should be lower, with many suggesting 50dph lower in a suburban and urban setting and 100dph lower in a central setting.

Some suggested additional scrutiny should be linked to a percentage increase in proposed density over the existing density of an area.

Respondents also commented that the central, urban and suburban areas need to be more clearly defined.

Question 8:

The City recognises that building at higher densities can present a range of on-going management challenges whose resolution will be critical to the success of the scheme. It has not been within the scope of this SPD to address these challenges, but it is hoped that a separate practice note will be prepared later in the year dealing with this. What should the scope of this practice note be?

Response: 44 answered 31 skipped

44 respondents chose to share their opinion on what the scope of a management practice note should be, with key themes set out below:

- Sustainability of the building/ development and resilience to climate change.
- How the design has sought to minimise long term maintenance and management challenges.
- Management of communal spaces.
- Proposed management/ service charges for residents to ensure long term affordability and accountability of management companies.
- Capacity of existing infrastructure, including utilities, to accommodate proposed development.
- Mechanisms to establish resident led management committees, code of conduct and Bristol City list of approved management companies.
- Mechanisms for monitoring the implementation of management plans by the local authority.
- Life-cycle costs, including running and repair cost implications for leaseholders and tenants through service charges.
- Green infrastructure and long term landscape maintenance.
- Management on the public realm and social inclusion.

3. Statutory consultation on draft: Detailed Survey

Question 9:

To inform the preparation of this SPD, the City has undertaken a review of a number of higher density schemes recently built in the city, with a view to identifying best practice. It has also held a number of stakeholder events with Bristol's planning, design and development community to better understand the issues involved with delivering good quality higher density schemes. The findings of this can be found in a companion document 'Urban Living – Learning from recent higher density developments' Do you think there are any additional learning points that we have missed through the Case Study review?

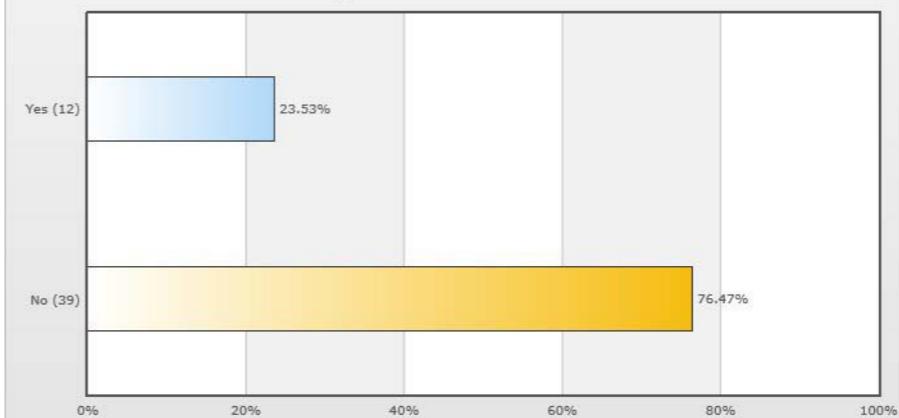
Response: 40 answered 35 skipped

40 respondents chose to share their opinion on the companion document prepared in support of the Urban Living SPD, particularly relating to any learning points that have been missed through the case study review. These are set out below:

- Lessons could be learnt from studying areas of historic development, including popular Georgian and Victorian residential areas in Bristol.
- Estate regeneration examples, such as New Gorbals, Glasgow, delivering a high density, mid-rise scheme.
- Gather opinions from residents and neighbours of schemes to understand the day-to-day liveability and experience.
- Look to other core cities which have more experience with tall buildings to draw out key lessons as Bristol has limited examples of successful tall buildings.
- Look to European cities with similar climates such as the Netherlands, Germany and Nordic countries, some of which have gone for tall buildings and some mid-rise high density to draw out key lessons and comparisons.
- Further investigation of the influence of community engagement- at what point in the process were residents consulted? What level of input did the community have?
- Could have looked at less positive examples to identify key failings and how these could be avoided.

Question 10:

10. Would the SPD be more useful to use if it was split into 2 parts? 1) Introduction, Design Guidance, Quality Standards & Tall Buildings 2) Guidance on Planning Applications & Assessment Criteria



Response: 51 answered 24 skipped 26 Extended answer

51 respondents chose to share their opinion on whether the document would be more useful to use if it was split into two parts. Over 70% responded that it would not.

26 respondents chose to provide additional general comments on the draft Urban Living SPD, with key themes set out below:

- Guidance should have greater focus on high density, mid-rise urban form and promotion of this form of densification.
- Ensure higher density development is for the betterment of all residents, including areas surrounding proposals, utilising opportunities to create cohesive, mixed communities.
- The SPD places too much emphasis on tall buildings.
- Higher density development and tall buildings are two separate issues. The SPD confuses this; suggest two separate documents are created to reflect this.
- If the aim is to guide the location and siting of tall buildings, the document needs to include a more detailed study of important views across the whole city.
- Content of the SPD is not considered to be supplementary guidance and so should be incorporated into the local plan review.
- Greater emphasis should be placed on the health and wellbeing of living at higher density, including addressing social inequalities. As such there is general concern that the promotion of residential accommodation in tall buildings (10+ storeys) goes against research which suggests this is not conducive to wellbeing.

3. Statutory consultation on draft: Letters

Feedback by Letter

145 respondents chose to share their views by letter. Of the letters received one third came from Bedminster residents, with the remaining coming from a professional audience.

Views were received from across the breadth of professions including developers, planning agents, architects, special interest bodies such as Historic England, Landscape Institute, Home Builders Federation, Walking Alliance and many others, together with a range of responses from amenity and community groups.

No specific template was set out for response by letter, therefore respondents were able to choose which sections of the document they wished to give their feedback on.

Therefore the following section provides a summary of the feedback received grouped around the key headings of the Urban Living- Making successful places at higher densities draft SPD.

Mayor's Foreword

- The statement in the Mayor's forward ('I want Bristol's skyline to grow etc.') must be seriously challenged. Given the unique topography and character of our city the two positions he advocates are irreconcilable: The promotion of tall buildings will lead to a permanent change in the scale, appearance and character of the city. Since it is essentially irrelevant to the provision housing it should be with in a separate update to SPD1; Tall Buildings, dealing with all building types.
- We do not support the Mayor's statement, "*I want Bristol's skyline to grow. Tall buildings... built in the right way... in the right places...and for the right reasons...communicate ambition and energy.*" There was no public consultation to precede the Mayor's initiative.
- Appreciation of the Mayor's view on the need to protect the unique character of the city and also avoid the planning mistakes of the past.

General Principles

- Conflicting policy agendas - for example employment protection and heritage
- Climate change - Policies on climate change mitigation measures are contained in the Local Plan and should be more clearly referenced in all related documents.
- Reduce focus on tall buildings- Medium rise should be promoted to achieve density not tall buildings
- General Principle recommendation - the need to carefully and sensitively design new residential units within an urban setting to avoid conflict with existing uses which contribute to Bristol's cultural

and night-time economy, thus aligning it with the new Agent of Change policy in the Local Plan Review. Additional design guidance required.

1. Introduction

Definition/vision

- Lacks a vision statement/non-technical summary; there is scope for setting out an inspirational vision for living at high density that matches Freiburg, Vauban, Accordia Cambridge or Cambridge-ClayFarm etc.
- There is a clear need to relate new development to the necessary transport infrastructure, schools, GP surgeries, other local amenities and appropriate open spaces. We support moves to create communities on larger sites, or to integrate with existing on smaller sites. To work well this means providing accommodation for families and the elderly as well as young workers and students and alternative tenures. It also means mixed use and live-work provision.
- SPD should refer to the target of 33,500 new homes as a minimum target.
- Concern about the translation of the old slogan "live, work and play" into "live, work and socialise". The guidance will not ensure adequate space for active play, or opportunities for outdoor exercise.

Role of SPD

- Development management matters such as those referred to within this draft document should be dealt with through the Local Plan and not SPD because SPD is not subject to independent

examination or viability testing. Including these prescriptive requirements within an SPD is contrary to the NPPF which states that SPDs should not add to the financial burden of development.

- Assessment of future focus areas for urban living should be undertaken more fully through the Local Plan Review and not be led by an SPD; which is considered to be a premature output of the Local Plan Review.

Understanding Context

- Policy context required
- Character and identity of the city needs describing, including blue and green infrastructure, unique topography, conservation areas and interrelationship of built form accentuating and dramatising these topographical features.
- Recognition of the individual character of different parts of the City would be welcome and create a relationship to character appraisals within Local Plans.
- The guidance should reinforce the message that design should always respond to and reinforce its particular context
- SPD will need to clarify how higher densities can be achieved within historic contexts that safeguard Bristol's unique character and the significance of its heritage assets, avoiding the planning mistakes of the past
- Local distinctiveness is not explored at 'City Scale'
- Increased densities should be considered with an overall Masterplan for the city, not in a piecemeal way

3. Statutory consultation on draft: Letters

- A future draft of this document might be better if the Urban ring is subdivided to reflect the historic high density and generally affluent Georgian and Victorian suburbs (which have little scope for comprehensive redevelopment) and areas with significant amounts of inadequate post war light industrial space - no longer attractive to likely users due to its condition and location.

2. Optimising Density – Design Guidance

Location Guidance

- Locational guidance should take account of landscape setting and social infrastructure
- Lacks a vision for intensification
- Future focus for urban living should be undertaken more fully through the Local Plan Review and not be led by an SPD
- Broadly support Eastside plan (Figure 5), but seek written clarity and a clearer link with Bristol Local Plan Review (Proposal CDS2 and CDS3) and clarity required on how this plan should be interpreted (providing sliding scale or guidance on building heights).
- New map required which clarifies where optimal densities, city centre living and tall buildings will be acceptable
- The whole of the purple area (Fig 5) should be designated as an area which tall buildings might be considered by the Council to be appropriate
- Fig. 5 is already being misinterpreted as indicating sites for tall buildings. The relationship between these and Important city centre landmarks and important city centre vantage points needs to be examined in greater depth, taking account of the

- city's topography and skyline.
- Fig 5- the seven 'focus areas' which indicate the potential for tall buildings seem somewhat arbitrary – for example, in respect of Temple Quarter a relatively limited area is defined which has the potential to stifle the future innovative development and the regeneration of that locality, an area recognised to be of great opportunity for the City.
- Figure 5. not explained, requires additional analysis and explanation
- Figure 5 omits a number of key vantage points in the harbour area, for example views east to the Cathedral and city centre from the vicinity of Hotwells/Nova Scotia; and north to the gorge and Clifton Suspension Bridge from the A370 approach and adjoining open spaces.
- Vantage points -clarity required on the role of the vantage points identified in Fig 5
- The central area has and continues to be a focus for investment and there are no signs that this is stopping. However, the same momentum is not evident in the suburbs and therefore in instances where private developers are actively looking to invest in these more peripheral areas, they should be encouraged to do so rather than hindered in any way. We therefore consider that higher (including hyper) densities can be delivered within suburban areas as well as the central areas on appropriate sites e.g. Broadwalk Shopping Centre in Knowle which is not currently highlighted as an Urban Living Focal Area in Fig 4
- Should include proximity to shops selling fresh food

- Focal Areas - Arbitrarily selected; too prescriptive; will stifle innovation in design of higher density development; likely to be unviable outside Bristol City Centre
- The areas identified for a focus on urban living should be amended to 'This will involve focussing growth on transport hubs, district centres, the city centre and areas of underused land and low-density development with good access to services and facilities'.
- Concern Fig 20 could imply tall buildings might be looked on favourably in areas shaded deep purple

Site/ development specific comments:

- Welcome Ashton Gate's inclusion, but support for higher density living in the area should not be contingent on the railway at Ashton Gate coming forward - the potential already exists for densities between 100-350dph as the area already has excellent access
- Brislington: Urban Living SPD welcomed as timely in identifying the changing nature and potential of this part of Brislington from industrial to residential, and are welcomed for facilitating this spatial shift.
- Amend Fig 5 to show a focal area in East Bedminster, between Philip Street and St. Luke's Road
- Supports the identification of land to the south of Castle Park for urban intensification as it contains the Central Health Clinic
- Fig 5 should be amended to include Unite's forthcoming mixed-use development at Old Bristol Infirmary Building, Marlborough Street
- Figure 5 should conform with Policy CDS7. 44-47 Coronation Road should be included
- Request that the focal areas in Figure 5 are defined with greater clarity and the Western Harbour area is extended southwards to encompass the area comprising the Bonded Warehouse (C-Bond), Thomas Ware Tannery and Payne's Shipyard.
- The City Centre Framework identifies The Galleries Shopping Centre and parts of Horsefair as appropriate locations for buildings of amplified city scale and tall buildings but this is not reflected in Figure 5
- 'Western Harbour' is not a place name or geography (Cumberland Basin is)
- Whilst Figure 5 identifies Temple Quarter as an area with potential for higher density it is considered the "hotspot" should be enlarged to accommodate Silverthorne Lane which is considered (by the representative) to be suitable for tall buildings. The hotspot areas in general terms should be examined more closely as they should be more precise.
- Ashton Gate considered good location for tall buildings
- We are very concerned that the document at the moment seems to suggest that urban living as described for parts of the Central area, is going to come to Hengrove, Inns Court, Hartcliffe Way - perhaps through speculative planning applications based on the current document. This concern is based on the presumption that local services/ infrastructure would not be provided which will support residents; and that any changes will be unnecessarily out of character with the local area

3. Statutory consultation on draft: Letters

and change perceptions of what is a very physically green area with informal routes for people and wildlife.

- the Urban Living SPD fails to include large parts of the city centre as having the potential for optimising density through the urban living approach. These are the locations the Council considers can most readily accommodate tall buildings. In particular the area around Fusion Tower is excluded despite already having a cluster of taller buildings including those to the north of Lewins Mead (Number 1 Bristol, Whitefriars & Premier Inn). New tall buildings in this location would fit in with the prevailing character it is therefore considered the boundary should be reconsidered. It is acknowledged that rises in land levels further north could make taller buildings more challenging.

Bedminster

- The scale of the development (both in terms of residential densities and height of buildings) is proving highly unpopular in the local community. This has been articulated very strongly through this consultation period ((61 written responses; 38 detailed survey responses with Bedminster postcodes). Key concerns can be summarised as follows:

- 1 Very high density (350 dwellings per hectare) is too much for Bedminster – from a community and environmental perspective.
- 2 New large-scale development needs supportive infrastructure, such as schools and doctors' surgeries.

- 3 Bedminster already exceeds the legal limit for air pollution.
- 4 Very tall buildings aren't the only solution to increasing housing stock and are inappropriate for Bedminster.
- 5 Homes shouldn't come at the expense of current employment space.
- 6 Bedminster has a unique and historic character.
- 7 Bedminster is an urban area, not an inner-city area.
- 8 Bedminster should have a joined-up overall plan (a master-plan) that is developed with the community.
- Bedminster Conservation Area should be expended to include Bedminster Green

Density

General

- Densification without high-rise advocated: *"There is no question that high urban densities are important, but the question is how high, and in what form," says architect Lloyd Alter. "There is what I have called the Goldilocks density: dense enough to support vibrant main streets with retail and services for local needs, but not too high that people can't take the stairs in a pinch. Dense enough to support bike and transit infrastructure, but not so dense to need subways and huge underground parking garages. Dense enough to build a sense of community, but not so dense as to have everyone slip into anonymity.....At the Goldilocks density, streets are a joy to walk; sun can penetrate to street level and the ground floors are often filled with cafes that spill out onto the street, where one can sit without being blown away, as*

often happens around towers. Yet the buildings can accommodate a lot of people: traditional Parisian districts house up to 26,000 people per sq km; Barcelona's Example district clocks in at an extraordinary 36,000."

- Residential - Top down plan required instead that identifies precise housing targets and provides a clear planning strategy where increased height and densities can be delivered
 - Too much focus on units per hectare
 - SPD should measure density in terms of people per hectare then there would be an opportunity to introduce more 3-bed dwellings.
 - Agree that it is appropriate to encourage the development of higher densities in appropriate locations such as those benefiting from good public transport connections but an increase in density across most areas should be applied with caution. The broad definition of Central, Urban and Suburban contained within the proposed SPD is pictorial and descriptive giving insufficient guidance on exactly where or how the Council's proposals would be implemented.
 - General premise that height correlates to residential density is however fundamentally flawed.
 - Support high density developments in the appropriate locations such as areas with existing facilities and employment opportunities.
 - Mid-rise is acceptable
 - Development should be in keeping with the area. Smaller developments should be lower rise.
 - Environmental issues should be considered
 - Support high density if the are planned long-term to create healthy communities

- Support high density but not by default tall buildings
- Document should indicate how high density development can deliver affordable housing
- Should include employment opportunities, especially artist and creative industries
- Encourage mix of housing typologies
- Support higher density ensuring it is designed with high quality public realm
- Supports high density in locations indicated
- Support general principles
- High density development should include mixed uses and high quality public realm
- Midrise is more successful than tall building for people's well being
- High density should be supported along high streets
- Infill suburb site should also have increased development density
- Medium rise delivers the same occupational density as tall buildings
- High density can be achieved with tight grain rather than tall buildings
- Create developments that support people's well-being
- High density should be achieved through medium rise not high rise
- SPG is not balanced and should define essential amenities, consulting with local communities and producing a master plan for urban living locations.
- High density housing can just as easily be achieved in buildings of 9 storeys where supportive infrastructures can be incorporated in characterful architectural designs.

3. Statutory consultation on draft: Letters

- High density should be innovative, bold and brave.
- Governing bodies refuse to follow the wishes of the people
- Green based buildings should be considered
- Solar rooftops should be considered
- High quality designs should be used
- What is appropriate/inappropriate housing? What rationale is used when determining higher densities? Are the densities and building heights suggested really appropriate for housing or are the calculations for commercial use simply being applied?
- SPD does not consider housing for a whole life cycle, calculating densities for different planning uses and traffic impact assessments
- We agree that increasing density is desirable for the reasons noted in the SPD and conclude that this can largely be achieved by increasing heights quite widely as suggested.
- Supportive of aspiration to develop at higher densities and flexibility within Policy ULH3 and Urban Living SPD to entertain new types of design, scale and form within the city.
- The guidance should also recognise the importance of viability and delivery.

Hyper density

- Rigorous impact testing of densities over 350dph is not unreasonable but it should not be to the extent that hyper density is precluded as a viable model for sites where context makes it appropriate for a tall building
- Advice on hyper-density (over 350dph) is confusing with the document stating that it is discouraged

- but then goes on to say it would be subject to rigorous impact testing - our view is the latter is more appropriate
- Lower than 350dph to trigger increased scrutiny
- The hyper-density threshold of 350dph should not be 'discouraged'
- Higher densities might be more workable in the Build for Rent sector, and with good design and good amenities most qualities could be maintained.
- Additional scrutiny should be applied to all 7-9 storey buildings.

Lower density

- The City is already missing opportunities to increase density that wouldn't involve tall buildings by accepting developments at or near the policy minimum, including on land the Council owns e.g. Alderman Moore's and Hengrove Park
- A minimum density of 50dph-we doubt whether that is appropriate and achievable in many areas beyond the urban core. Wording is different from the adopted Core Strategy which 'seeks densities of 50dph' rather than 'requires a minimum of 50dph'. Object to the removal of this standard from the Local Plan where it could be examined

City-scale

- Industrial/trading estates (p19)- needs to be consistent and clear policy messaging required across Local Plan and SPD in terms of range of uses appropriate for intensification
- The emphasis on better use of under-used industrial land could be further emphasised. Text

suggestion: Those industrial and distribution areas that are not protected solely for employment use in the Local Plan should be redeveloped at higher density for a mix of uses, including city living and new forms of workspace.

- Missed opportunity to create a more positive and enabling policy environment for using higher densities to help make suburban areas more successful places. This is a particular issue for a number of highly disadvantaged low density estates on the edges of Bristol, where low densities compound and intensify disadvantage (e.g. Knowle West)
- Support for 'opt-in' citizen-led densification could include: a Community Design Code to set requirements around parking, access, space standards, design quality etc; a cap on the number of micro-sites that can be developed within a neighbourhood, with the cap being set at the most devolved level possible; prioritising the development of micro-sites that are close to amenities, public transport routes etc.

Neighbourhood scale

- It is essential that sufficient local services are in place prior to occupation of urban apartment communities.
- Is it the intention to use the 500m placemaking circle for developments of only 10no. dwellings or will there be a sliding scale of distance relative to the size of the project?
- Text suggestion 'In some instances, higher density development will be appropriate beyond the catchment of local centres and in more transitional

areas. Development in these areas should consider the same principles in defining the layout, density and mix of uses across the site.'

- Assessment requirement threshold of local facilities should increase to schemes of 100 homes and above.
- Neighbourhood design diagram - concern that the cycle route takes a meandering path largely bypassing the local centre and cycling is not included along the main distributor road; reference should be made to the emerging Cycling and Walking Infrastructure Plan; more reference required to traffic restraint measures; Strategic cycle Network needs adding to accessibility diagram with maximum distance as defined in the Bristol Cycling Strategy
- Needs expanding to include the contribution blue and green infrastructure, pedestrian and cycling routes and street making can make. Health and well-being needs adding as an aim
- Concern about lack of requirement for developers of small schemes to contribute to creating walkable compact neighbourhoods .
- Concern about lack of traffic control. Need to reduce number of vehicles to make walking more attractive.

Street/Block scale

- Co-ordination required with the Council's proposed Transport Management Guide, with both adopting the approach advocated through Manual for Streets
- Diagram required showing high density perimeter block that conveys that higher densities can be

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achieved through good placemaking

- Street / block scale: The principle of direct sunlight to active streets is sound, but there are many successful examples in Bristol of streets with spill out which receive less than 5 hours sunlight at the Autumn Equinox and so proposals should be judged on a case by case basis.
- Street enclosure ratios – recognition should be given to the fact that greater height to width ratios than 1:1 can be successful given careful design. Historic examples include streets in the Old City in Bristol and Shad Thames in London. The definitions of 'very strong', 'strong' and 'enclosure' senses of enclosure could be supported by reference to existing Bristol streets, exemplars from elsewhere and to character appraisals of the relevant parts of the city. This section should be considered in the context of updated highway standards and critical dimensions for utilities and tree planting. There are possible unintended consequences in the guidance; for example, the street width of 1:3 applied to three-storey houses in a suburban area produces a distance between buildings of 27m which is in excess of the old bye-law standards. Essex Design Guide and the London Housing Design Guide refer to other factors that may affect the perception of width: with a series of observations provided.
- Block/street: Text suggestion 'Large scale developments (those above 2 hectares) need to incorporate a variety of typologies within the scheme which are suitable for families, elderly, co-living and those with specific accessibility needs.'
- Daylight and sunlight guidance - too prescriptive; highlights NPPF consultation draft which advocates

flexible approach

- Lack of sun-light to rooms on the street frontage can be mitigated if living spaces and rear gardens receive sun (i.e. with East-West orientation)
- Block scale -Fig. 9 Transition between prevailing building height and increased scale of new development. The unintended consequence of this, (if taken literally by Development Control) this could result in some very banal architecture that is out of character with its surroundings. Parts of Bristol are characterised by abrupt changes in building height. The Tall Buildings section provides some safeguard against buildings being overwhelmed by their neighbours.
- Street/block scale -The text (page 28) sets out general principles, which might be better condensed into bullet points.
- Text suggestion: *Required* changed to *encouraged*- Within large scale residential developments, a variety of housing offers is encouraged. The mix may include provision for some of the following; single people and couples, families, elderly people, private renting, students and co-living, depending on need, existing provision and site context.
- Need to address the impact of densification on transport (advocates use of PTALS)
- Parking - assumption that city centre residential should have car parking should be challenged
- Parking -Lack of car parking within new developments impact local residents; Create more dwellings with adequate car parking spaces
- Parking - concerned about emphasis on on-street parking; vehicle parking in a street context should be considered as a matter of last resort after all

other options have been exhausted; on-street parking prohibits uptake of electric vehicles as charging infrastructure will not be possible; valuable highway space should be prioritised for people movement, not parked vehicles

- Concern about passive acceptance of future changes in travel behaviour rather than active enabling of walking, cycling and public transport through design.

Building scale

- Key diagram required setting out a range of built form spanning from a) small scale infill b) new housing at 3-4 storeys c) apartments at 6 storeys in perimeter blocks d) tall buildings
- Adaptable buildings guidance requires reinforcing and the term long-life loose fit including.
- Building scale: We would hope that the language describing off-site construction would recognise that it is not always suitable rather than prescribing it as a preferred method
- Building scale: allow for future possibilities to adjust internal walls to allow flexibility as between uses or to oversize access areas to allow for more intensive future occupation) could be an expensive and potentially inappropriate focus for design-in an urban context
- Building scale: For conversions, infill sites and constrained block/ street contexts the flexibility to orientate in relation to sun path may not exist.
- should be recognised that multiple entrances are generally not compatible with some of the forms of development encouraged by the SPD, for example private rented apartments and tall buildings

Masterplans

- SPD imposes restrictive requirement for masterplans to be prepared
- Text suggestions on when a masterplan is required-A *Masterplan will normally be required for developments having any one or more of the following characteristics, with exceptions to this to be agreed through the pre-application process:*'
- It is not clear why a masterplan is required for developments that include a tall building

Housing

- More consideration should be given to other forms of residential tenure, social housing and student accommodation, as well as changing tenures (e.g. retrofit of hotels and offices to residential). A 'long-life, loose fit' approach may be appropriate.
- Dwelling mix and location of family housing: there is a need for guidance on this. The majority of schemes currently coming forward within the areas designated on Fig.5 are for one- and two-bedroom dwellings.
- Differentiation of housing type: consider student accommodation along with what was previously called 'Housing for the Young and Mobile', separately from family housing. This is much more suitable to high-rise.
- Build for Rent is not represented in this document beyond passing reference. Text in glossary should say that Government and the Council are seeking to promote Build for Rent. Reference should also be made to encouraging Co-Living to diversify the development model and provide choice of housing for people. This model fits particularly well with Build for Rent schemes

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- The Council's proposals are unlikely to provide a variety of typologies to meet the housing needs of different groups. The Council should not underestimate the challenge of encouraging households other than a transient population focussed on students and young professionals to embrace urban living in high density developments.
- The growing population is mostly of young families whose needs are not met by high rise living – better a higher density of low rise housing making it easier for parents to care for their children and for those children to get fresh air and play out in open space.
- *"I have lived in neighbourhoods that are predominantly 1 & 2 bed apartments, with student flats, and they are not places where people invest themselves, by nature they are transitory, and that does not promote healthy social cohesion, or good mental health. What is needed is a broader range to include not just individuals or couples, but families and the elderly".*
- Document should include affordable housing targets.
- Ensure at least 40% affordable homes is delivered.
- Greater controls on rent and landlords, giving tenants more rights and protections legally would go much further to tackling the issues people face today.
- Keen to see housing that creates long-term, well planned, stable and balanced communities that have the future needs of the residents in mind

Infrastructure

- Page 18 refers to the need for infrastructure to be in place to facilitate Urban Living - it's not clear what infrastructure is being referred to - is it saying that if there aren't enough doctors and dentists to support a residential development then it won't be permitted? If not, it needs to.
- The SPD proposes that development is contingent on the provision of infrastructure and public transport services and if necessary, development should be phased. Given the funding and lead-in times involved in providing infrastructure such proposals are unlikely to be conducive to the delivery of needed housing or infrastructure
- *"We believe that successful 'densification' will only happen if there is strong leadership from the planning system to ensure that quality infrastructure is provided as an integral part of development. We regret that these factors do not figure more strongly, for example in the proposed quality standards for residential schemes, checklists and requirements of Design and Access statements. We hope that the proposed Transport Development Management Guide will be of great relevance in this context".*
- With regard to infrastructure, how can traffic impact assessments be made when the densities that generate additional congestion are still to be determined?
- Underground usage should be considered

Public Realm/private realm/green infrastructure

- Green amenity should be considered as part of densification
- Increasing density should include good public realm
- Green space should not be built on
- Outdoor shared garden space with space for fruit trees and other fruit and vegetable growing should be part of every development. In Copenhagen the green space, growing space, and play space for high density apartment blocks are thought of as 'private parks' i.e. people understand the shared use of a park, rather than as 'communal gardens' i.e. which implies that one is forced to share something that ought to be private. It would be good to promote this kind of shared culture within Bristol's urban living realm
- We note that the norm in new developments in Bristol is to have hard surfaces just about everywhere outdoors with only the odd tree poking through. We believe that the default should be different, with earth, trees, pollinator friendly planting, and sustainable urban drainage schemes being the norm, and hard surfacing only used where essential
- The design needs to ensure that daily deliveries can easily be made to the retail and cafe units, and that recycling and food waste collections are easy
- Design for the growth in use of active travel (walking and cycling) and ensure that children can be safe and independently mobile, this means safe routes, permeability, and plenty of indoor and outdoor bike storage and parking
- SPD should reference the role of the West of England GI Plan in helping to meet the challenges of creating a high quality public realm as part of higher density development
- The public realm can be adversely affected by tall buildings, creating overshadowing and wind tunnels
- Further emphasis should be given to the role of trees in providing 'human scale' in the street scene. Trees provide a key tool in successful urban design at higher densities, providing shelter, intimacy of space, progression in scale to substantial buildings and focal features, aside from the range of amenity and other environmental benefits they bring.
- For all higher density development we need to ensure that people have easy access to clean open space for recreation and exercise.

Spatial Frameworks

- The proposal for a 'spatial plan' to be prepared for areas of anticipated change is unclear. This is assumed to mean broad development frameworks for large areas of change (like the one prepared for the Enterprise Quarter, for example). Such an approach should be applied proportionately and flexibly where land is in a number of ownerships and areas might come forward at different stages. Its needs to be made clear how what role such 'spatial plans' would play in the planning process. For example, it is unclear what weight is presently attached to the Temple Quarter Enterprise Zone Spatial Framework.
- The areas for Urban Living need stronger design guidance (BCC should publish a schedule of Spatial

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Frameworks it intends to do)

- It will be necessary for the Council's housing trajectory to incorporate appropriate timeframes for such master planning.
- The SPD should recognise that physical, environmental and social infrastructure must be identified and defined early in the planning process and that it may be incumbent on more than one development partner to facilitate and fund such infrastructure. If time and resources are limited the identification of infrastructure requirements should take priority over the preparation of spatial frameworks. Whilst Historic England guidance 'Tall Buildings - Advice Note 4' argues for a plan-led approach to the location of tall buildings this does not necessarily mean that spatial frameworks for areas of anticipated change are required as this may stifle innovation and the ability of the market to respond to changing demands.
- We believe that the successful development of the 'Urban Living focal areas' will require spatial frameworks setting out clear expectations of developers. We are concerned that leaving this to 'stakeholders' will not prove satisfactory, and we would like to see the Council taking the lead.
- Can be subjective and potentially restrictive e.g. Temple Quarter Spatial Framework. When will they be prepared and by whom? Could delay the development process
- Support the development of 3-dimensional spatial frameworks/masterplans for key sites, providing these are developed at an early stage with adequate public consultation and an awareness of market expectations.

3. Residential Quality Standards

General

- This one size fits all approach does not address the needs of those who are looking for something different. Bristol needs to diversify the design and supply of housing types and develop products that are better suited to specific lifestyles, demographics or occupation housing that is location and shared amenities, not just size sensitive. This new type of housing like Tiny House Community Bristol will be smaller, smarter and more community focused. It will be for those that do not require, and/or cannot afford, the familiar solutions that will come out of these new space standards.
- The standards are too prescriptive and will result in unintended consequences; potentially inhibiting the delivery of higher density.
- It is not the role of an SPD to impose higher or different standards than those set out in adopted planning policy.
- The standards should not add to the financial burden of development; should be subject to viability testing through the Local Plan Review process.
- Evidence base and justification for a number of the standards are weak/ missing. Bristol should produce its own evidence to justify standards.
- The Residential Quality Standards should be clearly defined as objectives, rather than minimum standards.
- SPD should build in flexibility to standards for

different residential typologies- such as PRS/ Build to rent and student accommodation.

- Challenging to apply standards to alterations or extensions to existing buildings.
- Concern that there is a lack of standards for public space, including soft landscaping and tree planting, and walking routes.
- More child-friendly standards are required to determine the quality and safety of spaces around the home.
- Very difficult to achieve all the standards in any scheme; even more challenging in constrained higher density schemes- evidenced by the fact many of the (case study) schemes referenced do not comply.
- Standards should be tighter.
- It is unclear if the standards apply to all major schemes (10+ units) or just flatted developments.

Private Outdoor Space (QS1-4)

- Focus should be on well-designed communal area that is suitable for all.
- Particular concern is raised over the requirements for external amenity space for all units, play requirements, core provision and emphasis on direct access to sunlight that will significantly reduce the achievable quantums and viability of schemes - particularly on constrained sites;

RQS1:

- Standard is too prescriptive.
- Large balconies may not always be appropriate where they might impact negatively on the setting/ historic character, where they are north facing or in noisy environments.

- Should be flexibility to allow open space to be provided communally if balconies are not appropriate, or scope to provide open space requirement offsite where sites are particularly constrained or where there is close proximity to high quality parks and open space.
- Question whether private outdoor space is always necessary for residential accommodation in the most urban contexts. In the case of conversions of existing buildings and tight infill developments it may be difficult or impossible to include. Examples of high value/ highly regarded apartments without private external space can be found in both historic and recent development contexts.
- If there is any possibility of a child living in a unit it should have its own private and immediately accessible outdoor space in addition to communal open space where residents can interact and children can play together.

RQS3:

- Further guidance and agreement on how child yield is to be calculated to allow developers to fill in the required information in Checklist.
- The intent of this standard is reasonable but the size of the space should equate to the number of children provided for, not the overall number of residents.
- Definition of door step play is ambiguous.
- Should allow flexibility which takes into account proximity to appropriate play facilities, which would otherwise result in inefficient use of space, as is the case in the London Housing SPG, which allows an exception where existing play facilities are within 100m.

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- The standard lacks the detail set out by the Mayor of London's Housing SPG, on which it is based, which cross references the Mayor of London's Play SPG. Beyond a defined area, what encompasses suitable provision for under 5's is not stated and this also ignores provision for older children.

RQS4:

- General agreement that 1500mm is a preferred guidance dimension for a usable balcony but (in constrained site circumstances) would not wish to preclude design options for lesser balconies that may (in conjunction with full height doors) still be worth including rather than have none.
- 3m x 1.5m is a good and useful size for a balcony.
- References to 'sunny' should be clarified to refer to direct sunlight where possible and access to sufficient daylight as it may not always be possible to locate balconies away from north facing elevations for all units.

Shared Internal Circulation Space (RQS 5-11)

- Unclear evidence base.
- Standard 10 and 11 are best handled under Building Regulations.
- Standard 7, 10 and 11 are not legitimate planning issues.

RQS6:

- Delivery methods are changing rapidly and this is not considered to be a planning issue.
- This may be straightforward to include where concierge facilities are proposed, but not in many other cases.

RQS7:

- Generally, it is likely that this limit would be complied with as a matter of course. However, there is a need for flexibility and any such restriction needs to be based on evidence and a clear setting out of sound reasons.
- Disagree with limiting to 6 dwellings to a core (London recommends 8); 10 units is suggested by one respondent so as not to undermine building efficiency and viability.

RQS9:

- Should not be set as a minimum given that widths of 1.2m-1.5m have been successfully applied on other schemes, with Build for Rent schemes often increasing to 1.8m because of more furniture moves. Should consider narrower widths where corridors serve fewer units from a core or that narrow at their end.
- Utilising opportunities for natural light is agreed as a starting point. It is however difficult to provide natural light to all circulation spaces consistently, as by their nature they service dwellings which would be prioritised for outlook/access to light.
- Increasing minimum widths beyond 1.2m will affect net to gross efficiency and scheme viability.

RQS10:

- Question the interaction of planning and building regulations/ fire safety standards.
- Note that the provision as drafted would appear to preclude 'penthouse' units.

RQS11:

- Configuring living rooms next to living rooms and bedrooms next to bedrooms in vertical and horizontal arrangement will be difficult to achieve in many cases, especially where a mix of accommodation and uses is to be provided (as required by other sections of the guidance). It is reasonable to require design to consider/ limit noise transmission but noise insulation as well as layout is relevant and the layout aspect must be presented as a suggestion rather than a requirement.

Parking and Servicing (RQS 12-14)

RQS12:

- Flexibility required. The provision of naturally lit storage areas is likely to be unrealistic.
- Cycles are vulnerable in large communal stores- they should be provided on core by core basis.
- Double stacking and 45 degree cycle stands are essential to be able to accommodate the very large numbers of cycles required by standards within the building. They also hold each bicycle which is why cyclists prefer them to Sheffield stands where the bike is more susceptible to damage. Not covered in the SPD, but we also feel that the ratio of cycle parking should be reviewed to ensure against over provision.
- Question the need for the communal cycle storage to provide space for prams given that accommodating sufficient secure cycle provision on site is already challenging and that prams should surely be stored in individual dwellings.

- Charging points and secure storage locations for electric bikes, mobility scooters and electric wheelchairs should be provided

RQS13:

- Parking standards could reflect the impact of falling car ownership, the greater number of electric vehicles and anticipate the implications of autonomous vehicles.
- Infrastructure will need to be in place to facilitate a transition to alternative fuels. SPD should require the inclusion of the infrastructure to every parking bay to enable the future connection of a charger appropriate for overnight charging, including to the roadside with charging via lampposts.
- The standard as proposed is reasonable, although we would comment that Parking Standards that are cross-referenced also need to evolve to fully embrace the Urban Living agenda. The associated notes in trying to cover a wide range of possible typologies (from the very urban to the near-suburban types of urban living) are generally helpful but can be over-prescriptive in precluding options that may be appropriate in site specific contexts (e.g. private garages can work successfully in a 'mews' context). For the most urban schemes which have little or no parking provision and have very good public transport access some of the suggested requirements for on plot or on-street parking seem inappropriate (including for example the suggested requirement to provide a car parking space for each wheelchair accessible dwelling).
- Concern about encouragement of on-street

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parking. Visually obtrusive, and crossing roads between parked cars is difficult and dangerous. Cars cruising around looking for spaces are also intrusive and dangerous.

RQS14:

- Should include ability to recycle human waste.
- Waste storage doesn't always have to be integrated into the building mass if alternative storage can be well integrated elsewhere (e.g. as part of well thought out landscaping design.)

Individual Dwellings (RQS15-20)

RQS15:

- Units required to be designed to Building Regulations M4(3) should be "wheelchair adaptable" as opposed to "wheelchair accessible". These allow these units to be appealing and marketable to either wheelchair or able bodied residents. Designing the remaining units to BR M4(2) is very onerous and will impact viability. It also precludes stepped access in any circumstances. The scrapped Lifetime Homes standards, which had similar standards to Building Regulations M4(2), allowed dispensation on this matter where site conditions e.g. steep gradients, prevented reasonable provision of step free access.
- Believe 10% wheelchair user dwellings is too high - and could only reasonably be imposed on Affordable Units

- The Local Plan must either adopt the Nationally Described Space Standard or have no space standards; it should not be set in an SPD.
- Exception should be made to allow Tiny House dwellings and smaller module homes (around 26sqm) should be considered as part of the solution to the housing crisis.
- Generally supported, however, we note the Government's consultation on Build to Rent development standards which raises the question as to whether such standards (amongst others) are appropriate for Build to Rent developments and suggest flexibility in the approach where different building typologies are proposed.
- Consideration should be given to the flexibility of a given space in reference to acoustic standards between rooms. The old Lifetime Homes Standard included flexible alternatives to room use that made provision for the positioning of plumbing for future living patterns without compromising the living experience with removable partitions.

RQS16:

- Flexibility required. The London Design Guide proposed a ceiling height based upon room depth that gave more flexibility to the design whilst ensuring daylighting standards were respected.
- This is borrowed from the Mayor of London and was designed to help prevent overheating. The evidence for this is flimsy; generous windows, cross-ventilation and sun -shading are more important.
- 2.3m acceptable in circulation spaces, kitchens and bedrooms with heightening ceilings towards the windows and in the living areas

- Agree that (if building heights and costs are unconstrained) 2.5m ceiling heights are desirable, our experience is that when working within tight urban constraints (including existing buildings and height limitations imposed by urban design and views considerations) this may not always be achievable. The overall effect of imposing a combination of increased minimum floor areas, ceiling heights and circulation and servicing areas will be a significant increase in costs per unit and reduction in viability. The effects of this will be most particularly evident for the market entry level smallest units.
- No evidence base of rationale to support the height specified.

RQS17:

- Greater clarification on what constitutes adequate.
- Adequate privacy can be achieved in a number of ways and applying 'rules' such as 21 metres, will not allow the dense urban environments that can work well.

RQS18:

- A flexible approach is required, taking account of possible design mitigations; as currently drafted the standard proposes to preclude both North Facing and larger (3 bed plus) single aspect units.
- Recognise the benefits of dual aspect units but also their implications on the built form which will limit their use. Some north-ish facing single aspect units are inevitably part of the mix on many dense urban sites and can provide a good quality environment.
- Many urban living schemes have a significant

proportion of single aspect units. This is for a number of reasons notably the benefits that such dwellings offer in terms of net/ gross efficiencies, the efficient use of land from using relatively deep building blocks, the inherent flexibility of central corridor layouts which typically allow access to two lift/ stair cores, and the structural and mechanical and electrical efficiencies of a central spine within each block.

RQS19:

- Full height openable window requirement is overly prescriptive.
- This may also be inappropriate in historically sensitive sites

RQS20:

- The approach is agreed with as a starting point. However, the use of mechanical ventilation will likely be necessary in some 'Urban Living' situations to address air quality constraints. Where this is the case it could also be utilised as a means to overcome any overheating concerns to allow for further flexibility. Otherwise, where such a solution is proposed this could be mitigated by additional renewable energy provision to offset the additional resultant energy demand, which would again provide further flexibility, while mitigating any negative impacts.
- Building Control Standards cover this issue.

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4. Tall Buildings

General

- SPD1 Tall Buildings (2005) should not be cast aside so quickly
- The approach to tall buildings would benefit from maintaining defined SPD1 areas and thresholds in the absence of detailed area studies in the interim.
- Sceptical of the Council's ability to deliver more tall buildings (defined as 1.5 times higher than the prevailing height) in the short term due to significant environmental and contextual challenges to be overcome including a change in the outlook of residents to accept re-development at higher densities which may not be forthcoming.
- Requiring additional scrutiny of buildings of 30+ metres (10 storeys) may result in not achieving the yields expected from tall buildings.
- Difference in language/message between Local Review (encourage high quality tall buildings in the right places and the right design) and SPD. For example the Local Plan Review proposal (ULH4) to 'encourage high quality tall buildings in the right places and of the right design' is omitted from the SPD. The SPD recognises the benefits of taller buildings in strategic locations, but does not positively encourage their development in the same ilk as the Local Plan Review.
- Local support should not be a test over the acceptability of a tall building on the basis that strong local support is unlikely to be achieved in any location within the City
- Requires a separate draft SPD that deals with all building types and allows full consultation on the

potential impact on the city. The key views of the city and its topographical integrity are more vulnerable not only to tall residential buildings but commercial buildings.

- Tall buildings should embrace green technology
- In specific locations, e.g. to emphasise key points in the urban fabric, there may be opportunities for buildings of more than 10 stories, but do not see this as a primary contribution to higher urban densities. The economics of tall buildings are likely to limit their appeal to the market, particularly outside the city centre. The historic context of the centre will also limit much taller buildings.
- Tall buildings will not contribute to the provision of more truly 'affordable' homes due to their building and management costs. It is also not clear how they are to be "designed to meet changing needs of occupants". Their design, as noted, will be critical and we are aware of the challenges this presents and of unsatisfactory examples.

Definition and threshold for tall building assessment

Tall Buildings:

- Definition of "tower" is needed as opposed to "tall building".
- Rationale for increasing the definition of a "tall building" from the earlier SPD 1 level of 9 storeys/27 metres by a single storey/3 metres is not clear. This does not indicate an ambition to change the city's skyline, but rather a continuing reluctance to change.
- SPD's assertion that the prevailing building height is typically 4-6 storeys in the City Centre

is misleading because a notable proportion of buildings exceed 6-storeys.

- The Urban Living document states that "tall" buildings, except in the very centre of the city itself, start at 10 storeys. In the British urban context, certainly in Bristol, "tall" starts at 5 storeys maximum.
- Additional scrutiny not appropriate for additional floor or essential rooftop plant to an existing building.

Prevailing and amplified heights:

- Definition is overly constraining, resulting in disproportionate information/assessment requirements at the lower scale. 1.5 times of consistent heights of 1 or 2 storeys (which are evident in many industrial areas proposed for intensification) would result in schemes of 2-3 storeys being applied an unreasonable level of assessment. It is recommended that a minimum storey threshold of 4 storeys be set, which could potentially be increased for the following stated higher information/assessment requirements of 6 storeys. This would broadly reflect the previous guidance in SPD1.
- 1.5 increase in height from existing to new development is not a modest increase; tall buildings should be limited to 1 storey above adjacent properties

Siting tall buildings

- The content and scope of guidance covering tall buildings is limited and does not sufficiently update/ replace guidance in the current SPD1: Tall

buildings to appropriately facilitate the delivery of high quality tall buildings in the right location through a coherent city-wide approach/ strategy.

- SPD might usefully incorporate a Views Protection Framework and incorporate a criteria in relationship to the historic environment to inform the location for tall buildings similar to that in SPD1 (BCC 2005), referring to this in General Principles. The use of a 3-D modelling should also be considered.
- The Tall Buildings Advice Note 4 prepared by Historic England does not refer to spatial frameworks but does recommend a role for local plans in identifying locations appropriate for tall buildings. There is therefore need for clarification of the provisions in the draft SPD on this matter and what the expectations are in respect of the local plan process and in respect of planning applications.
- Need to review the statement 'that locations where a tall building should not be located include where it "has a detrimental impact on the city's historic environment", as it fails to recognise current policy and guidance with regard to heritage assets as set out in the NPPF paragraphs 132,133, and134 which include the need to give great weight to the asset's conservation but also to consider any degree of harm and to weigh such harm against the public benefits of the proposal.
- The SPD needs to be more precise about which areas of the city are suitable for tall buildings identifying specific sites. These should be informed by Urban Characterisation and Building Heights studies. This might also in areas of the city where clusters of tall buildings already exist.

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- Suggested separation distances between tall buildings considered both too restrictive and not restrictive enough in terms of ensuring sufficient open space between towers.

Design excellence

- Concern that the analysis of any tall buildings into three parts: top, middle and base is too restrictive and does not reflect the approach to many popular tall building types and forms, including a tower coming straight to ground, rather than sitting on a lower base block as suggested.

Sustainable design

- It is not clear how a single page of text in an SPD on Urban Living can even begin to address the complexities of the design of such buildings.
- Guidance to mitigate the difficulties of installing smart meters – or ideally installing smart meters at initial construction - should be part of the Environmental Impact Assessment for tall buildings. This is particularly the case for residential buildings of multiple occupancy.

Arguments for tall buildings

- Tall buildings good to accommodate students

Arguments against tall buildings

- Regularly sited criticisms include:
- Detrimental impact on the topography and skyline of Bristol; the poor impact they are likely to have on Bristol's historic character and hence tourist trade; their production of generic cities that look like each other; their poor impact on

the street environment; the failure of post-war high rise estates to deliver higher densities than 19th century neighbourhoods; high costs involved in initial build and subsequent maintenance; their unsuitability for many groups of people but particularly families with children; their negative impact on quality of life; their limitations in delivering housing for the less wealthy; their poor impact on health and well-being of residents; high energy usage compared to mid-rise; their ugly visual appearance; safety concerns, particularly after the Grenfell tragedy; tendency to isolate people; lack of sufficient infrastructure in Bristol to support tall buildings; poor neighbours, overshadowing surrounding development; tendency for disappointing designs.

"I am completely against these. My mum grew up in one in Birmingham in the 50's/60's when the knocked down her house in Aston. It started off nice enough, but by the time she moved out in 1969 it was deteriorating. I remember vividly feeling scared as a 5 year old travelling there to see my nan in the 70's before we moved her out because it had become an unsafe environment"

5. Guidance on submitting a planning application

Scrutiny

- There should be more rigorous impact testing where proposals differ from the current neighbourhood context, building form and building mix (not just hyper-density)

Design and Access Statements

- SPD should provide clarity to applicants as per NPPF (paragraphs 154 and 56-66)
- Design and Access Statements require a dedicated section, spelling out the requirements.

Checklists

- Checklists could be a useful aid in understanding the metrics of the scheme and should be included in the DAS. However some of the information required can be difficult to provide in the early stages of a proposal and so flexibility is required.
- More guidance is required on how the checklists will be used and how the quality of information managed.
- Checklist 1 is too prescriptive and duplicates what should already be in a DAS.
- Requirement for additional supporting information should be set out through the local list of validation requirements, not in the SPD.
- Issues with conflating additional scrutiny of tall building applications with higher density schemes through checklist 3- i.e. the visual impact of a low-rise higher density scheme is unlikely to be assessable by visual impact section.

Consultation

- Planning applications should have more consultation with surrounding community

Case Studies/Evidence Base

- General support for the promotion of low/mid-rise high density schemes identified in the case study report. However noted that a number of the

schemes reviewed do not, and could not, meet the requirements set out in the proposed Residential Quality Standards.

- The evidence base lacks context analysis. There is particular concern that the case study evidence base is too narrow, being only Bristol based. Also does not sufficiently address the theme of tall buildings; including only one example.
- Other good examples referenced include recent development in London (mid-rise with single tower elements of 9-10 stories), European countries with similar climate e.g. Netherlands, Germany and Nordic countries and North American/ Canadian cities such as Vancouver's model for mid-rise and tall buildings.
- None of the examples in the report reflect the proposed scale and density at Bedminster Green.

Other

- Language needs strengthening where guidance/ standards are proposed; greater clarity is required identify which elements comprise guidance as opposed to commentary.
- Clearer navigation and wayfinding required throughout the document.
- Image selection needs reviewing as many of the examples selected would not conform to the standards/design guidance being proposed or the issues they are illustrating are not clear.
- Need for a steering group to review document annually.
- DM officers need a sense of ownership over the SPD.
- Developers have too much power when it comes to making decisions about the density of urban

3. Statutory consultation on draft: Letters

development projects and more emphasis should be placed on local authorities and professional designers.

- It could as easily be argued that high densities and tall buildings embody greed and represent the triumph of developers over local citizens.
- UL SPD is not consistent with the City Centre Framework
- No regard is had to the employment/businesses that are displaced as a result of encouraging high density residential on brownfield land.
- Maritime small businesses need to be protected. The premises should be retained in their current form, and not redesigned into a bland and sanitised version of ‘heritage’.

Management

- Management practice note should cover; fire safety, health and well-being, waste disposal, communal areas, roof gardens etc. Arrangements for ongoing responsibility for future management should be addressed by the original development company.
- No details provided in the SPD as to what “a detailed assessment of the scheme’s future maintenance and management plans” would mean in practice. At application stage an operator or developer may not necessarily have sufficient information to provide “detailed assessment” of the schemes future maintenance and management plans – a proportionate approach should therefore be taken bearing in mind the specific circumstances of the case. For example providing framework details of the future management

and maintenance plans at application stage, with further details, to be provided by means of condition.

- The relationship between residents of ‘affordable housing’ and leaseholders can be difficult; there is currently no requirement for Management Companies to include a representative of the affordable units or from the social housing provider.
- What part of the Town and Country Planning legislation deals with scrutiny of maintenance and management of buildings- What skills are there within the Council to understand and meaningfully comment on the maintenance and management of a tall building? Maintenance and management of buildings can change over time. Will such a change invalidate a planning permission, or will a new application to implement a changed maintenance and management regime be required?

Consultation on draft SPD

- Sceptical of consultation process; consultation was not considered a ‘proper consultation’ with the window for feeding back on this document considered to be very narrow and consultation overall has been poor.
- The title ‘Urban Living’ and even the phrase ‘higher-density’ does not draw attention to the prime content of the SPD, which a replacement to the present Tall Buildings SPD. This could be considered misleading and is likely to produce a lower response than if it were titled honestly ‘Tall Buildings in Bristol’. The consultation document is inappropriately biased, introduced as it is by an

exhortation in favour of tall buildings, personally championed by the Mayor. It is not even-handed in its approach, and as such fails the primary test of a consultation and is fundamentally undemocratic.

4. Consultation themes and responses

4.0 Key Issues raised on the Urban Living SPD

This section summarises feedback received through the consultation. The range of issues touched on through the consultation has been broad. It has therefore not been possible to provide a response to all the issues raised. Instead, the key re-occurring issues have been highlighted, with an initial idea of how we are likely to respond as we draft the final publication of the report. Our responses have in part also been informed by the White Paper on the NPPF which was released for consultation in March 2018, and the findings of the Hackitt Report (May 2018).

4.1 Optimising density by balancing the more efficient and effective use of land, with aspirations for successful placemaking, liveable homes, and a positive response to context.

There has been support across the board for this principle. The NPPF White Paper further confirms support for 'optimising' densities. However a general concern has been expressed by many respondents that the SPD is overly promotional of tall buildings in this context. There was also a concern that existing policies designed to protect context could undermine abilities to optimise densities

Response: The definition of Urban Living will be amended to omit reference to tall buildings. The SPD will make it clearer that whilst tall buildings are one way of potentially optimising densities, they aren't the only way, and aren't appropriate in all circumstances. The Local Plan review will look to make changes to Policy DM26 to allow plan-led deviations to the prevailing building heights to take place.

4.2 Urban Living Focal Areas

There has been general support for the 'Urban Living Focus Areas' identified, with the exception of the Bedminster Green area (see 4.8). However, the plans have been widely criticised for being ambiguous, and lacking clarity around the level of intensification anticipated. There is a concern that insufficient contextual analysis has been undertaken to inform the selection of areas.

Response: Guidance relating to specific locations for intensification will be contained in the Local Plan rather than the SPD, and expressed as Growth and Regeneration Areas, thus enabling further analysis and then scrutiny of those areas through the more protracted Local Plan process.

4.3 Spatial Frameworks

There is general support for the preparation of spatial frameworks for areas of anticipated change, but concerns that uncertainty about who will lead on their preparation and to what timetable, could delay the delivery of much needed homes in the city

Response: To date, Bristol City Council has led on the production of spatial frameworks (parts of the city centre, Temple Quarter and Hengrove), although landowners have been asked to come together to prepare a spatial framework for Bedminster Green. Bristol City Council's 'Growth and Regeneration Board' are currently prioritising which areas require spatial frameworks and who will produce them.

4.4 Residential density thresholds

The lower density threshold of 50dph was widely supported. Whilst there was significant public support for the principle of an upper density threshold at which proposals would be subject to greater scrutiny, the levels promoted by the draft SPD were considered too high. There was some concern from development professionals that the setting of thresholds for additional scrutiny were overly restrictive.

The lack of clarity in defining Central, Urban and Suburban areas was widely criticised.

Response: It is proposed that the lower density threshold is retained at 50dph. We will review whether a range of minimum indicative density thresholds will be provided across the city, supported by a new plan showing where these thresholds would apply. Minimum thresholds will be included in a rewritten policy within the new Local Plan. Upper density thresholds at which more scrutiny of proposals is required will be revised downwards and be retained within the SPD (but possibly not the Local Plan), and will also be supported by a plan showing where these thresholds would apply.

4.5 Residential Quality Standards

There has been divided opinion between public and residential amenity groups, who overwhelmingly support the introduction of standards, and development industry professionals who are largely opposed to the introduction of standards as a means of determining planning applications. The lack of a Bristol-specific evidence base and the legitimacy of introducing standards (considered to be over and above the requirements of Local Plan policy) has been widely challenged.

Other criticism has included the overly prescriptive wording, which may lead to unintended consequences and the fear of an overly mechanistic application of standards through the development management process. Clarification sought on whether the standards would apply solely to flatted developments. Questions rose over their applicability to PRS/ Build to Rent schemes, student accommodation, to building conversions and on highly constrained sites.

The NPPF endorses the industry backed 'Building for Life 12' as the preferred tool for assessing residential quality.

Response: Guidance will be redrafted as a series of prompts for discussion at the pre-application stage, using a format very similar to Building for Life 12 's traffic light system for assessing schemes. Whilst BfL12 provides a potentially useful tool to assess the placemaking qualities of a scheme, it is limited in terms of assessing the internal liveability of residential scheme. It is therefore proposed that quality standards relating to private outdoor space, shared internal circulation space and individual dwellings are retained, but rewritten as Liveability Indicators which are assessed in a similar way to the BfL12 criteria.

Elements of the standards that require clear policy links are proposed to be elevated into the emerging Local Plan with a new 'Liveability in residential development' policy being provided. This will include Space Standards, and requirements relating to Private Outdoor Space (quantity, dimensions of balconies, and requirement for doorstep play for the under 5s). Bristol is currently benchmarking itself against other local authorities to establish what further evidence may be required in respect to these new policies.

4. Consultation themes and responses

4.6 Tall Buildings

Again this was a topic that divided opinion between a strong public opinion against the avocation for tall buildings, both in principle, but also as a means for delivering higher density development and affordable housing, and some support from development industry professionals for the more positive approach to tall buildings. Although this was not consistent across all representations, with some professionals expressing caution around the general deliverability of tall buildings in the Bristol market, given the higher construction costs associated with building tall buildings.

Response: Guidance will be updated to acknowledge some of the criticisms of tall buildings raised through consultation, whilst at the same time making clear the significant differences in the development model, building typologies and aesthetic between tall buildings coming forward today compared with those people are familiar with from the post-war era.

Some disappointment expressed by the development industry that the SPD does not indicate specific areas where tall buildings would be encouraged or discouraged. This was considered a step backwards from the existing approach taken in SPD1 Tall Buildings.

Response: The Urban Living SPD provides guidance at a city-wide scale, whilst the Tall Buildings SPD1 provided guidance for just the city centre. The challenge of replicating the necessary context appraisal work that underpins SPD1 at a city-wide scale should not be under-estimated, and we have reluctantly concluded that this is beyond the scope of the Urban Living SPD. For instance, the City does not have a city-wide 3D model which it could use to test out viewpoints.

It is proposed that the existing view protection framework included in SPD1 Tall Buildings is reviewed and included in the revised document.

4.7 Understanding context

A concern was expressed that there was insufficient consideration of Bristol's unique physical context within the SPD (its topography, heritage assets and much valued townscapes).

Response: Guidance will be updated to include a new plan which better shows the relationship between existing urban character, existing intensity of usage and the potential for future intensification, highlighting the planning tools that would be required to unlock this potential.

4.8 Bedminster Green

A significant proportion of respondents have objected to proposals coming forward for the Bedminster Green area. The SPD has been widely misconceived as promoting residential densities of up to 350dph in this area

Response: The inclusions of a settings plan, will clarify that that Bedminster is an urban area rather than the central area, and as such the threshold level at which additional scrutiny of schemes is lower.

Appendix A:
Attendance List
March 2017

Organisation	Organisation
A	L
ABC	Lamber Smith Hampton
AHMM	The Landmark Practice
Alec French Architects	LPC Ltd
Arup	N
B	Nash Partnership
Beaumont Homes	Neighbourhood Planning Network
Bond Dickinson	NOMA Architects
Bristol Civic Society	O
Bristol Urban Design Forum	O'learyGoss Architects
The Bush Consultancy	OXF Architects
C	P
Cater Business Park	The PG Group
CSJ Planning Consultants Ltd	S
Cubex Property Developer and Investor	Savills
CPRE Avonside	Simon Mundy Projects
D	Sisman Property Consultants Ltd
Deeley Freed	Stride Treglown
DLR Property Development Ltd	T
Don Dickinson	Thrive
E	Turley
ESHA Architects	U
F	Urban Tranquillity Developments Ltd
FirstFox Architecture Ltd	V
G	Vivid Regeneration LLP
gcp Chartered Architects	W
The Guiness Partnership	Windmill Hill and Malago Community Planning Group
GVA	
H	
Highways England	
Historic England	
J	
JLL	
K	
Key Transport Consultants	

Appendix A:
Attendance List
September 2017

Organisation	Organisation
A	O
ABC	O'learyGoss Architects
AHMM	Origin 3
Alder King	P
Atkins Ltd	Pegasus Life
B	ProjectWorks
Bath and North East Somerset Council	
Barton Willmore LLP	S4L
Bond Dickenson	Savills
Bristol Civic Society	South Bristol Business
Bristol Urban Design Forum	Stride Treglown
The Bush Consultancy	Studio Hive
C	U
Colliers International	United Communities
Context 4D	University of the West of England
CSJ Planning Consultants Ltd	Urban Design Practice Ltd
Cubex Property Developer and Investor	Urbis Living Limited
E	W
ESHA Architects	Windmill Hill and Malago Community Planning Group
G	White Design
GVA	WYG
H	Y
Historic England	YTL Developments
J	
JIA Architects	
JLL	
K	
Keep Architecture	
L	
Local Agenda Ltd	
N	
Nash Partnership	
Neighbourhood Planning Network	
NOMA Architects	
Novell Tullet	

Appendix B: Consultation Letter



Telephone 0117 922 3748
E-mail citydesigngroup@bristol.gov.uk
Date February 2018

Urban Living Supplementary Planning Document Consultation

We are seeking your views on a draft Urban Living Supplementary Planning Document (SPD). This has been prepared to proactively communicate the council's ambition for higher density, quality developments across the city. The SPD will add further detail to a new Urban Living policy in the Bristol Local Plan which is being consulted upon at the same time. On adoption, the Urban Living SPD will replace the Tall Building SPD1.

The results of the consultation will feed into the final document which will be adopted by the Council in late Summer 2018 after which it will be a material consideration when assessing planning applications.

You can view the Urban Living SPD Consultation at www.bristol.gov.uk/urbanliving. Alternatively reference copies are available to view at libraries or at the reception at City Hall.

How to respond

Comments should be submitted by **13th April 2018**.

The online survey can be completed here www.bristol.gov.uk/urbanliving.

Comments can also be submitted to the following address:

By e-mail: citydesigngroup@bristol.gov.uk

By post:

City Design Team
Bristol City Council
City Hall
PO Box 3176
Bristol, BS3 9FS

Yours sincerely,

Vicky Smith
Service Manager
City Design Group

City Design Group
Bristol City Hall
College Green

Vicky Smith
Service Manager
City Design Group

Website
www.bristol.gov.uk



Appendix C: Consultation launch press release

New planning guidance proposed to help shape Bristol's skyline

01 Mar 2018

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"This is about creating good places to live for everyone and, importantly, establishing new neighbourhoods which everyone has a stake in, where no one gets left behind."

The guidance also identifies a set of quality standards designed to deliver high density quality homes and good places to live for all ages.

Cllr Nicola Beech, Cabinet Member for Spatial Planning and City Design at Bristol City Council, said:

Communities in Bristol are invited to comment on new planning guidance to help increase the density and height of future developments in the city. Bristol City Council has launched a consultation on the new Urban Living Supplementary Planning Document alongside a review of the local plan, which outlines the council's policies for deciding planning applications.

The Urban Living proposals are designed to support a significant increase in new and affordable homes in Bristol by encouraging the best use of land through more concentrated building and welcoming high quality taller buildings in the right places.

Marvin Rees, Mayor of Bristol, said:

"We have the opportunity to be much more ambitious in order to meet our growth requirements, while at the same time protecting the unique character of Bristol. This document is intended to encourage well-designed, connected and accessible neighbourhoods with a focus on regenerating brownfield land across the city. We need to take bold and innovative steps to make Bristol a joined up city, linking up people with jobs and with each other.

"I am confident this positive guidance can help meet the competing demands which developments need to fulfil in a busy urban environment like Bristol and ensure we have the right balance alongside our historic environment. Most areas of Bristol do have the potential to accommodate more growth and regeneration, which would see an increase in housing densities.

"Recent developments at Wapping Wharf and Paintworks are good examples of what we would like to see more of. There is already significant development interest in parts of the city centre's eastern fringes including Temple Quarter, Bristol's Shopping Quarter, Old Market and North Redcliffe, all of which are supported by established planning and design guidance, setting out a clear vision for these areas. We are keen to extend this interest eastwards, promoting renewal to some of Bristol's poorest communities."

You can view the Urban Living Supplementary Planning Guidance Consultation at www.bristol.gov.uk/urbanliving. Alternatively reference copies are available to view at libraries. Comments should be submitted by 13 April 2018.

The Bristol Local Plan Review consultation can also be viewed on the council's website at www.bristol.gov.uk/localplanreview. Copies are also available at libraries and the deadline for comments is 13 April 2018.

Downloads

Wapping Wharf development - CB Bristol Design 2017
[View](#) | [Download](#)

http://news.bristol.gov.uk/new_planning_guidance_proposed_to_help_shape_bristol_s 30/05/2018