Response to January 2023 partial consultation on Bristol Local Plan

20 January 2023 V3

Bristol Advisory Committee on Climate Change
Background

From December 2022 to January 2023, the members of Bristol Advisory Committee on Climate Change (BACCC) reviewed draft policies included within the scope of Bristol City Council’s November 2022 partial consultation underway as part of Bristol’s Local Plan review.

Members provided both detailed feedback against draft policies offline and attended a workshop on 12 January 2023 to take part in a high level discussion about the current status of and potential for these to inhibit and/or support Bristol’s ambitions to become net zero and climate resilient by 2030.

It should be noted that BACCC did not provide commentary during the March 2019 consultation on the full set of Local Plan Draft Policies and Development Allocations. The comments below should be seen in this context. In particular the committee have not had the opportunity to re-examine the development allocations in any detail or the corresponding housing quantum suggested for these areas, or any implications for likely place outcomes.

Granular feedback will be submitted directly to BCC’s planning officers, meanwhile this summary consolidates the key points BACCC wishes to make in response to the partial consultation, to inform and support the development of a Local Plan that is as robust as possible in enabling Bristol to meet its net zero and climate resilience goals.

Conclusions

The BACCC broadly supports the intent of the draft policies and commends the fact that these indicate the plan’s potential to become one of the more ambitious and progressive local plans in its residential targets but wishes to raise some key points in relation to the draft policies (below) in order to constructively support the development of more robust Local Plan policies.

The committee also welcomes the assurance that draft policies will be taken into material consideration for all new developments before its adoption and publication in 2025.
Key Points

Opportunities for a more strategic approach

○ The committee identified some gaps and opportunities to be more ambitious on climate change adaptation. Currently the policies focus on a small number of specific risks, rather than taking a wholesale approach to recognising local need and taking advantage of local opportunities to adapt to a changing climate. Other important climate changes have been missed entirely, these include (but are not limited to) higher intensity storms, water scarcity, more intense cold snaps, and emerging risks like wildfires.

○ The committee also recommends Local Plan policies do more to encourage developers to take a strategic approach to adaptation, considering climate change risks and needs of communities surrounding as well as within the proposed developments and how new additions to local spaces can enable wider community resilience – for example; safe evacuation routes, drainage, tree canopy cover, emergency hubs, meeting energy demands, etc.

○ BACCC encourages the Local Plan to be reviewed in light of neighbouring planning policies and that a strategic approach to interlinked issues such as flooding, transport and infrastructure provision should be required on the part of developers and policy officers. Bristol exists within a hydrological catchment that does not recognise administrative boundaries.

○ Transport is not included in this consultation, but drafts refer to the 2040 mass transit system. In order to support Bristol’s 2030 ambitions, much earlier consideration of the vast changes to the way people are travelling by 2030 must be reflected in Local Plan policies.

○ The committee recognises that the Local Plan vision is inconsistent with the One City Climate Strategy which has a vision of a Bristol that is resilient by 2030 (rather than 2040). In developing the next iteration of the Local Plan, BCC should seek to harmonise the timescales of the two processes and if impossible to do so then to explain why this cannot be achieved.
- The committee recognises that the Local Plan sits within a much wider context of activities and other policies to enable net zero and climate change adaptation and feel there is a greater opportunity to demonstrate this connectivity and wider context within the text of the plan itself.

**To stay ahead of the curve**

- As the respective local (2030) and national (2050) net zero target dates approach, the policy context for net zero will rapidly change. It will be imperative that this flexibility and policy context is reflected within the Local Plan so it remains relevant once published.

- On publication the embodied carbon targets will be ahead of the curve, but a review of these mid-formal Local Plan review cycle will be required to ensure that these remain up to date.

- Planning policies also need to provide flexibility for the future solutions that will emerge and policies that will be introduced, for example: no new gas from 2025, changes to water use, increased rates of active travel, last mile deliveries, car clubs, electric cars, behaviour change, heating and energy networks/ systems.

**On how policies are implemented / enforced**

- If and when the Local Plan is published and it successfully mandates that new developments will not deliver additional operational carbon emissions or negatively impact local biodiversity once built, with minimal impact during building, it is critical that enforcement of these policies is sufficient, and sufficiently resourced, and penalties are in place when policy infractions do take place.

- BACCC recommends that tools are created to increase adaptation literacy and support planning officers to make informed decisions in relation to new planning decisions and their potential co-benefits and trade-offs in relation to adaptation, net zero and tackling the ecological emergency strategy.

**To support a just transition**

- The affordable housing proposals and percentage sought in new development is not included in this consultation. BACCC would urge that every opportunity is taken via the
planning system to secure a greater quantum of genuinely affordable homes of a mixture of tenure types and build form, including provision for families.

- It is critical to ensure that climate change adaptation and mitigation measures do not carry a premium for vulnerable communities within new developments, and that ample and accessible opportunities for preparing for and preventing climate change within affordable housing are created.

- Where innovative heating/energy systems are outside of the current scope of energy price regulation, these should be guaranteed to offer value to residents so that homes aren’t just energy efficient, but also supplied with affordable energy where they do require its use.

**Further points on net zero and climate mitigation**

- Despite recognising there are limits as to what smaller scale redevelopment is controlled formally via planning policies, as retrofit will be a huge part of Bristol’s transition to net zero, draft policies could do more to reflect and encourage repurposing and net zero modification of existing buildings.

- The committee welcomes the overall focus on reducing energy consumption, rather than solely focusing on switching to lower carbon emitting energy sources, though the council’s initiative with the City Leap programme and the roll out of district heating is to be commended.

- Planning policies need to recognise that we are already locked into extreme temperature projections and ensure wherever possible development eliminates future requirement for energy-hungry cooling systems within building and homes.

- Recommend more explicit guidance is provided on the off-setting scheme referenced in draft policies.

**Further points on adapting to changing climate**

- There is an opportunity for greater integration with other policy areas, including green infrastructure and energy supply. NZC1 should require not just the inclusion of both mitigation and adaptation strategies and measures, but the integration of both into a holistic approach that maximises co-benefits and manages trade-offs.
o Climate change adaptation is about changing what we do and how we do it to enable communities to thrive in the new and future climatic conditions and is not simply risk management overlaid onto business-as-usual development. The policy would benefit from some conceptual reframing, moving away from language that frames adaptation as mitigation of a handful of risks, towards a greater emphasis on broader adaptation.

o Adapting to climate change is location-specific and requires considerations beyond a development itself. Adaptation strategies should explicitly look at how the development enhances the lives of residents and the wider communities and locale in the context of climate change, and to address the adaptation needs of that specific location.

Biodiversity

While BACCC was formed to address the climate emergency, rather than the ecological emergency, we have included the following insights from members:

o Committee welcomes focus on net gain and recognition of importance of connectivity that has been reflected in draft policies but queried whether there is an opportunity to go further, making Bristol a leader – for example: aiming for 20% net gain, increasing urban greening or seeking 25% tree canopy cover on new street development.

o Recommend including reference to the UK Government’s decision that to make sustainable drainage systems (SUDs) mandatory for all new developments

o Recommend providing more clarity on which trees are classified as ‘important’ and why

o Recognition that new biodiversity gain is not equivalent to biodiversity loss, with effective enforcement and penalties to avoid loss of e.g existing trees.

o Recognition that the loss of existing biodiversity cannot be made up for by gains from new biodiversity.
Summary

Thank you to all BACCC members and BACCC register of experts who provided feedback to support this process. Thank you also to BCC for engaging with the process, and to BGCP for facilitating the meeting and supporting with the preparation of this document.

The Bristol Advisory Committee on Climate Change welcomes the opportunity to have engaged with the Local Plan consultation and would like to offer its support to BCC Planning team in the development of the complete Local Plan, including areas it has not previously had the opportunity to comment upon – as we may be able to offer expert perspectives on climate change adaptation, flood risk, density and geographic spread of developments.

We will share our conclusions with the One City Environment Board and, subsequently, other One City boards to support their next steps engaging local partners, including Bristol City Council, in the delivery of the One City Climate and Ecological Emergency strategies.

Jo House and Jim Longhurst, BACCC co-chairs
On behalf of the committee
17 January 2022