**Local plan – Draft Response**

Overarching policies

* It is key that all new homes are built with broadband, and with a choice of providers. The standard should be FTTP (fibre to the premise) to future-proof connections speeds necessary for modern life. We believe this should be a city-wide development standard and we think it is crucial for DS13 Lockleaze, where lack of provider choice has made internet access unaffordable for some, and the nearby Aurora Springs development suffered from very slow broadband because of poor infrastructure and no requirement on the developer to meet high speed internet requirements.
* We would like to see supplementary guidance to HMO policy restrict conversion of family homes to HMO across the city, recognizing the demand on housing from both students and families and the need for expansion in student numbers not to cost the city in terms of housing provision but be met by purpose built accommodation. In Bristol, both universities have had aggressive numbers strategies made possible by through overseas students and lifting of the government cap on UK students and their accommodation needs have resulted in conversion of family homes.There are examples of councils who have implemented such an approach (e.g.Southhampton) to protect much needed family homes and neighbourhood cohesion. Again this is especially true in Lockleaze where we are so close to UWE and where over 70% of existing housing stock is 3-bed semi-detached homes and we are often responding to planning applications to convert family homes to HMOs against the objections of neighbours, we need to planning approach that can mitigate impact on neighbourhood.
* Affordable housing proportion should be a minimum of 40% -- this is implicit in the target for 2000 new homes a year 800 affordable but is not consistently applied in affordable housing policy. We think there should also be targets for social rent homes, recognizing that 80% affordable is not meeting need for affordable housing.

Lockleaze DS13

THis policy should reference Lockleaze Community plan 2019-2024 and the holistic approach to development that goes beyond need for housing and transport infrastructure, to include community and health facilities. Lockleaze is recognised as an area of growth and regeneration, following many years of underinvestment in housing, infrastructure and community. Lockleaze has a Residents PLanning Group, an anchor community organization: Lockleaze Neighbourhood Trust, and has developed a residents’ community plan based on responses to a residents’ survey.

Employment and Retail Centres

Designation of town, and local centres – we note that Gainsborough Square is designated as a local centre but oddly Eastgate centre is not.

Eastgate Centre – is a local employment and economic hub, need to have this as a designated area (local centre), and some protection for land use as employment, or mix use land. We want to prevent gradual erosion of employment and facilities . We recognize that Eastgate needs positive long term approach that looks at different levels of traders, employment, i.e. recognize the changing nature of retail and that current model may need to change but we do not want it to revert to exclusively housing and remove this local employment centre.

It needs better access by walking and cycling

Paragraph on density: acknowledge possibility for higher density - only in appropriate locations - vistas stepped up toward square (not to impinge on skyline), infil - where appropriate

We would like to see a commitment to infrastructure beyond just transport mentioned in the document. In particular residents are concerned about local health provision, and that there is capacity to extend provision in Lockleaze.

Would like to see Horfield train station as part of Lockleaze infrastructure to meet need for sustainable transport in the area.

Mix of housing styles

Residents acknowledged mix of sizes and styles of housing to accommodate different forms of household, recognising high need for 1 and 2 beds but some need from extended homes.

Would like to see a commitment to accessible home standards. Noted that currently some residents having to pay bedroom tax as only accessible homes are two beds. Currently not enough accessible homes nationally, Lockleaze high levels of disability (all ages) and lower disability free years (i.e. people likely to be living with a disability later in life)

Would like thorough assessment of potential for renewables in Lockleaze. Lockleaze Neighbourhood Trust currently exploring roof top solar farm, planning group would like to see all new homes to have high levels of energy efficiency, also to explore other renewables. For example what is the potential for distribution heat networks amongst larger development sites?

Place principles

40% affordable - including council, social or ethical rent “genuinely affordable”

car club/ electric bike – need spaces in Lockleaze

Need for re-surfacing of Romney Avenue, Constable Road and Bonnington Walk. There is an opportunity for exploring induction charging, better walking and cycling facilities and other improvements to the walking and cycling infrastructure.

Electric car charging points should be part of new developments

We positively wish to retain and renew employment opportunities and avoid Lockleaze being a dormitory suburb, currently sites on Dovercourt Road identified as employment sites – we would support a mix-use development including some housing and employment opportunities, we are keen to not to lose these to solely housing. We’ve mentioned retaining Eastgate as an employment centre, and also would like to see the sites on Gainsborough square (Old Police Station and Cameron Centre) to be a mix of housing, community and employment to provide a vibrant local centre, and meet needs of community beyond just housing.

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

Lockleaze Neighbourhood Trust is pleased to see the direction of BCC’s proposed strategic policy in supporting Community Led Housing. This has also been demonstrated through the appointment of a dedicated CLH officer for Bristol which we fully support.

We welcome site allocations within Policy H5 for self-build, custom build or community-led housing including the proposed allocation of Bridge Farm. However, we are unsure as to why there are so few allocations and would encourage the Council to allocate additional sites for these sectors of housing within Lockleaze. This is especially given the identification of thirty-six ‘Key Development Sites’ identified within Lockleaze alone. If site assessments are insufficient to warrant a full site allocation, could the Council create a list of reserved allocations to demonstrate BCC’s support for community led housing? We understand several plots on Turner Gardens and Constable Road, have been identified as potential for self-build and community led housing and would like to see this recognized in the site allocations, along with sites on Romney Avenue. (Sites numbered 6, 9, 12, 13, 14, 15, 20, 21, 22, 31) from the Key Development site list for Lockleaze)

Furthermore, it would be helpful if Policy H5 indicated whether the council intends to facilitate a consultation process in which additional sites can be promoted towards an allocation.

We also welcome the aspect of the policy that proposes Community-led housing exception sites. We support the potential flexibility awarded to these sites although if the policy could also explaining the specific conditions would need to be met in order to qualify it would be less ambiguous. For example, in relation to development on Reserved Open space, defining what constitutes 'demonstrably supported by the local community' and what those requirements might entail.

Draft Allocations Plan

LNT recognises the need for more new houses to be built in Lockleaze. However, in relation to the land to the east of Romney Avenue (Site Allocation BDA2402), it is unclear why this hasn't been explicity identified as a site that would also be suitable for community led housing.

It is also felt that given this site's location adjacent to the Grade II Listed Historic Park, Stoke Park, that there is an opportunity to provide a sensitively designed, mixed use development with an A3 ground floor use to activate the space and complement the park.

Open spaces

Local open spaces - survives the whole life of the plan

Reserved open spaces can be reviewed - who decides if needed?

Stoke Park – most is designated as Local open space but there are a few sections that are reserve open space. We see no logic for the delineation and think it should all be Local open space.

We note that none of the housing greens have any protection and think this is remiss. We suggest that they are made reserved open spaces (which would allow for part of them to be amended for car parking if this met with resident wishes provided some measure of recreation and or visual amenity is maintained or improved as a result). List should include: Turner Gardens, Copley Gardens, Landseer avenue, Thornycroft Close, Haydon Gardens, Orpen Gardens, Downman Road, Romney Avenue.

Lockleaze Resident Planning Group

Discussed and agreed Thursday 2 May