

Hotwells and Cliftonwood Community Association
Response to Regulation 19 Draft Bristol Local Plan Consultation
Submitted January 2024

Introduction and Context for Local Plan Objections

1. Hotwells and Cliftonwood Community Association (HCCA) was founded in the 1974, becoming established as a limited company on 5 April 1984 and an incorporated charity registered with the Charity Commission on 16 March 1995. The Community Association's aim is to 'promote the benefit of all people who live and work in the area of Hotwells and Cliftonwood and its neighbourhood, without distinction of sex or of political, religious or other opinions... in a common effort to improve the conditions of life for all, through education, information and the provision of facilities and activities that support community wellbeing'.
2. The Community Association covers the area of Hotwells and Cliftonwood. This is an increasingly multicultural area, there are in excess of 6000 residents living within our boundaries. This is an inner-city residential area, with modest local services. People living and working in this area see their wider neighbourhood to include Clifton Village for day-to-day shopping, North Street, Southville for wider shopping and entertainment and look towards the City Centre for more major retail services and entertainment. People living in this area work across the City and beyond. There is a significant number of small businesses registered in the area, many working from home. There is an extremely strong focus towards the Bristol Harbour and Cumberland Basin for leisure activities, for open space, walking and cycling, and links to the countryside beyond. We do not consider our area to be part of the City Centre of Bristol.
3. The Cumberland Basin is the focus for many people living in the area and for local businesses. This is an historic name. The Council has clumsily renamed this area 'Western Harbour' without any consultation, reasoning, or effective communication.
4. The growing impact of climate change and the need to take action is at the top of the Community Association agenda, we are already concerned at the impact of increased flooding the area experiences and this is only projected to get worse.
5. The Community Association area includes a mix of housing types and tenures including several areas of high levels of deprivation and overcrowding. In parts there is also a concentration of houses in multiple occupation (HIMOs). Whilst there are quite a few older people living in the area there are no bespoke older people's homes.
6. The Community Association has for some time been concerned to ensure a sustainable neighbourhood. In particular we would like to see a reduction in through traffic, rat running and to encourage a switch to walking and cycling. Since the south Bristol link road has opened and the area has experienced an increase in through traffic along the Portway linking for example Bristol Airport to the Midlands and Wales.
7. The Community Association area is short on open space, hence local people value access to the Cumberland Basin, to Bower Ashton, to Ashton Park and to the Avon Gorge and at greater distance to the Downs. Over the years the Community Association has fought to save local space such as Granby Green, and Ambra Vale Park from development. We also manage and maintain the Cumberland Piazza.
8. The Community Association once had at its heart the Hope Centre Community Arts Centre, but this was returned to the landlord in the early 2000s. There has been an ongoing campaign to get new community facilities for this area which is currently very poorly served
9. Further information on HCCA can be found on our website
www.hotwellscliftonwood.org.uk

Objections to the Regulation 19 Bristol Local Plan and why the Community Association feels the Plan is unsound.

Overall vision and strategy

10. HCCA note and support the overall vision of the Local Plan to seek a better and more inclusive Bristol. We also understand and support the commentary on the UN goals on Sustainable Development as set out at the beginning of the Plan.
11. However, HCCA does not support the Development Strategy of the Local Plan, and is not persuaded that the plan is really committed to achieving sustainable development that “meets the needs of the present without compromising the ability of future generations to meet their own needs”. As set out on the National Planning Policy Framework (NPPF) Local Authorities need to engage with communities. There is no explicit policy/statement in the Local Plan that shows that the Council has embedded community engagement into its processes.
12. This is of great concern, given that people living in the HCCA area feel that they have been disregarded or excluded on several key development issues from the previous work on Western Harbour, Metrobus development, Clanage Road, the caravan site, issues raised with the planning department and at Neighbourhood Forum meetings
13. On a point that risks sounding pedantic, the drafting of boundaries for policy and strategy areas in the Local Plan is at best inconsistent but is likely to confuse and be impossible to implement in future development schemes. In particular, the Western Harbour boundaries vary from Local Plan to masterplanning and the housing maps use several different boundaries.

Objection to Development Strategy which has no policy

14. The overall Local Plan Development Strategy which, whilst not set out as a Policy, needs to be considered in more detail. This does not link for example to a transport strategy and set a clear strategic plan. More locally, as drafted, the strategy cuts the HCCA area in two, leaving the community facing different policies and potential outcomes. We do not agree that part of our area should be seen as ‘Central Area’ which would then have ‘city centre policies’ applied. We feel Hotwells and Cliftonwood should be seen as part of North West Bristol. That would mean that Western Harbour would then be part of the North West Policy area. This would be consistent with how the Development Strategy has set out Central Bedminster as part of South Bristol.

Objection to Policy DS1: Bristol City Centre

15. **Objection is that** – Western Harbour should not be included in the Central Area, and described as City Centre, this area does not display city centre characteristics. Local people strongly identify with this area they do not identify or experience City Centre living. If Western Harbour is retained in Policy DS1: City Centre it would have city centre policies applied, which HCCA do not support, from high densities to lack of certainty over the percentage of affordable homes developed. This would be wholly out of character with the area and is unacceptable. Policy DS1 refers to Western Harbour as a new quarter; there is already a quarter with people living there, with heritage assets, with local pubs and restaurants. What is the definition of a new quarter?
16. **Change required-** redraw the City Centre Boundaries and remove Hotwells, Cliftonwood, and Western Harbour, locally known as Cumberland Basin from Policy DS1 Bristol City Centre.
17. **Conclude Local Plan is unsound.**

Objection to Policy DS4: Western Harbour

18. **Objection is that** – The City Council invented Western Harbour and began a strategy for growth in the area which locals know as Cumberland Basin. We know there is a need for repairs to the roads and bridges, to improve flood defences and that as part of that work there may be an opportunity for some development. In the absence of a transport strategy for Bristol, this is very difficult to plan for. Please note Riverside Garden Centre is a cherished community asset, and we also believe that there is an opportunity for community and cultural facilities using the B Bond building.
19. To be clear, the matter of flooding is of huge concern, HCCA believes that the Bristol Avon Flood Strategy needs a radical overhaul, and thus we object below to Policy FR2, and until this is resolved we cannot see how a development strategy for any of the possible sites can be developed.
20. **Change required** - We note that the Local Plan map of the Western Harbour area is not consistent with the map on the Harbour Hopes website and the planned masterplanning area. We would like to see Avon Crescent, Nova Scotia Place, Ashton Avenue and Dock Cottages taken outside of the Western Harbour area. This would then start to bring the Western Harbour development area in line with Policy H2 that protects existing homes and thus ensure that local residents are reassured that their homes are not at risk.
21. On page 29 of the Maps, P24 Clifton Village, Hotwells and Ashton Gate Map shows the Western Harbour area not coloured in at all. There are existing facilities there, existing open spaces and existing local services which are not shown. This is not a blank canvas; local people do not want to lose valued local facilities. Indeed, Policy DS4 refers to retention of high-quality open spaces.
22. Policy DS4 refers to “A reconfigured road system, replacing the present network of roads and bridges with a simplified system;” this is jumping to conclusions which the masterplan must respond to. In line with recent assurances from the City Council we would like the policy to be clearer that a reconfigured road system does not necessarily mean replacement of the current network but could also mean repair and upgrade. So, amend words to read ‘repair or replace’.
23. The final point is that the housing numbers shared in other documents we believe lead to an assumption of between 500 and 3500 new homes in Western Harbour, we object to the high numbers and want the Council to commit to developing new urban solutions to high quality housing design which would also allow the mix and type of new homes this area needs. We also object to Policy UL1 Effective and Efficient Use of land since this policy points to this area having new housing at a density of Bristol City Centre rather than inner urban areas. See figure 5.1
24. **Conclude Local Plan is unsound with regard to the assumptions behind Policy DS4 : Western Harbour.**

Infrastructure, Developer contributions and Social Value

25. **Objection to Policy IDC1 and SV1 is that** – Developer contributions and Community Infrastructure Levy (CIL) and Social Value outputs from Western Harbour are not assured and there is no guarantee they will be forthcoming for the local area. It is totally unclear how the CIL, social value and the economic benefits of Western Harbour Development would be developed, who would be party to any negotiations and what percentage of development costs this might represent. Most local authorities would have an Infrastructure Delivery Plan Schedule. There is no indication whether an Infrastructure Delivery Plan Schedule would be developed for the City, or for each major strategy area. This clearly needs a lot more working out and until that work is done these policies are clearly unsound.

26. Within our area there are significant levels of deprivation. There is also a significant transient community. What will the social value of these developments bring for local people? What will these plans do to improve lives for local people, help reduce deprivation, support local businesses and create local jobs?
27. People who are already living in deprivation in the area around Western Harbour are disproportionately affected by the lack of opportunities, services, and amenities in the area. This needs to be addressed much more strongly by Western Harbour development proposals with funding set aside for example of a new community facility ideally at B Bond, for additional school places, new local medical facilities, and for local business support as well as employment and training initiatives to enable local young people to get jobs from development.
28. **Change required-** we need to agree how the CIL proposals will be worked out for this area and how they will be spent inline with community need.
29. **Conclude Local Plan is unsound with regard to Policy IDC1: Development Contributions and CIL and Policy SV1 Social Value and Inclusion.**

Housing

30. **Objection to Policy UL1, HS1 and AH1- Accommodation** within the HCCA area is a mix of privately owned properties, private rentals, social housing, houses, and flats. There is a significant student population, a large number of houses in multiple occupation along the Hotwell Road as well as micro-communities living in deprivation.
31. Overall, our local community would welcome the development of new and affordable homes in our neighbourhood in line with local need. We would like to see good quality homes for older people who could move from family houses and continue living in the area. We would also like to see more affordable homes. We are unhappy that we some of our area might be seen as City Centre with high density and affordable homes delivered based on viability rather than Bristol North West where 35% affordable homes would be a requirement of development. Evidence suggests we would achieve more affordable homes based on a 35% policy. Again, maps and boundaries of the different policies are inconsistent.
32. As stated in the paragraphs above, HCCA is confused by the proposed scale of the development overall with figures quoted between 500-3500 new homes being created in the area. We cannot see how the upper figures could possibly be accommodated and this in turn would mean that the Local Plan Housing targets could not be met and the Plan therefore be unsound
33. **Change required to resolve objection** -amend boundaries so that all Hotwells and Cliftonwood is described as Inner Urban and part of Bristol North West, and then reassess actual number of homes that might be achieved in well-designed new urban areas.
34. **Conclude Local Plan is unsound regarding its ability to deliver the number of homes proposed on Western Harbour and other sites within Hotwells and Cliftonwood area.**

Centres, shopping and the evening economy

35. **Objection** with regard to the statements in the text of Policies SSE1 and SSE2 Retail Policies and comments on Hotwell Road. If the spirit is to protect local retail, then the Council needs to follow this through and resist changes from retail to residential. We note that this policy states that the emphasis in SSE1 is on the retention of existing amenities and services on Hotwell Rd (not Hotwells Rd, note spelling). At present there is one convenience store, no pharmacy, post office or proper shop. This is clearly inadequate given the pressure for growth.

36. ***Policy SSE1 refers to Hotwell Road as part of this City Centre, which we contest.***
The policy goes on to say that the plan does not rule out new centres, we welcome that comment. We would like to work with the Council to agree where a new local centre to serve existing and new communities including Western Harbour would be best located.
37. ***Change required-*** to get local name right, to remove Hotwell Road from all City Centre sections, and to commit to study and agree a local services review and to plan for new local centre, building on existing hubs.
38. ***Conclude Local Plan is unsound since it does not properly plan for the retail needs of the area.***

Biodiversity, Green Infrastructure and Open Space.

39. ***Strongly Support BG1, and BG5 in promoting green infrastructure in the City but Object to Policies G11 and G12*** mainly since they leave out all the green space in our area. Objection is that – G11 does not allocate the Cumberland Piazza as a significant open space. This is Hotwells and Cliftonwood's main large public space. We would like reassurances that this is retained and improved as part of Western Harbour Plans. It is well used by all generations for exercise and relaxation. Young children learn to cycle there. Exercise classes have created a regular community gathering and young people regularly use the skate spot. HCCA holds community events there as well as monthly gardening sessions.
40. We also object to Policy G11 and G12 since none of the green open spaces around the harbour, A and B Bonds are shown on the map P24 on pages 24 of the Maps nor on the Western Harbour Map page 28. They are simply left to the Western Harbour brief to deal, which provide no reassurance that green space will be retained
41. ***Change required- carry out review and add sites to policy maps***
42. ***Conclude Local Plan is unsound.***

Climate Change

43. ***Objection to Policy FR2 Bristol Avon Flood Strategy*** – HCCA is particularly concerned with the issues of flood risk, water management and the Bristol Avon Flood Strategy. We have recently objected to the Bristol Avon Flood Strategy which the City Council recently considered at a Cabinet meeting on 23 January 2024. HCCA believe Bristol Avon Flood Strategy is unsound – it misrepresents the current flood risk and proposes mitigation measures - i.e. raised defences - that are not in line with best practice or what people want. See the HCCA statement to BCC which is attached.
44. ***Change required to resolve*** there needs to be a more accountable and effective Flood strategy which is based on best practice and the clear principles of sustainable development. On this basis alone we consider that Bristol Local Plan is not consistent with the principles of sustainable development and is therefore unsound
45. ***Conclude Local Plan is unsound***

Traffic and Transport Policies

46. ***Objection that*** – there is no strategic transport policy proposal contained within the Bristol Local Plan which would set out city region traffic and transport needs, where these are and how these would impact on the City. And therefore, need to be planned for. This is especially important for Hotwells and Cliftonwood since the strategic A4 route passes directly through our community, bringing pollution, congestion, and noise and if this continues that would impact hugely on any new development in the Western Harbour area. The Plan needs to be clear whether the A4 linking to the south Bristol link road and thus routes from Bristol Airport to the Midlands and Wales will need to

continue to come through this area in the future. If this is a retained strategic route what repairs and improvements should be planned for to ensure least harm to residential areas. The Local Plan needs to be clear on the complete hierarchy of transport infrastructure from strategic road to walking and cycling routes, and especially to find ways to plan for better public transport for Hotwells and Cliftonwood.

47. At the recent community meeting local people expressed concerns about proposed changes to the existing road system. Comments included 'that we all know that Hotwell Road is a gateway to Bristol and a major link. It currently works. The current road system is largely effective and syphons a huge amount of traffic away from the Island (Oldfield Road, Sandford Road, Charles Place, Oldfield Place) which impacts local pollution and damage to this community'.
48. **Change required-** there needs to be an overarching new Policy T1 - Transport Strategy- which sets up the city region transport needs and thus what works and what needs to change for the future until this is included it is impossible to set out requirements for individual schemes, including Western Harbour.
49. **Conclude Local Plan is unsound with regard to transport policy.**

Culture and Community Facilities

50. **Objection is that** – there is no clarity over the mechanics for assessing needs and then planning for new culture and community facilities
51. **Change required-** Despite the relative level of deprivation in our area we have few amenities and services. We no longer have a GP Surgery (closed in 2016). The role of Hotwell Road as a High Street has been eroded over the last two decades. We have no dedicated community space, we lost Hope Centre around 2000 and while the reuse of Jacobs Wells Baths will provide some local facilities this is not highly accessible to the area as a whole and will not replace the services and amenities this area has lost. HCCA values the assets we have including the maritime heritage, the Harbour and Cumberland Piazza, the last has been regenerated by community efforts over the 10 years. We have a strong sense of community in the HCCA area which is evident in long standing community events such as Hotwells Panto and Cliftonwood Open Air Cinema. We would like to work with the Council on a new community services hub located at B Bond which would support both existing and new communities including those living in Western Harbour
52. **Conclude Local Plan is unsound.**

Conclusion

53. HCCA representatives would like to meet with the Inspector at the Local Plan Inquiry and discuss the location of our area within the City, the vision we have for the future, how the local community would like to be better engaged with the Council in leading the placemaking for this part of Bristol and why we object to several policies as drafted in the Bristol Local Plan. This list is not exhaustive but goes to the heart of the Local Plan Strategy and the need to achieve sustainable development. We know places do not stand still, we all want to see a sustainable long-term future for our area but for residents, businesses and for future generations to realise this we need a better shared understanding of the position of this area in the City and for this reason we object to several of the Local Plan Policies as currently drafted and therefore find the draft Bristol Local Plan unsound.