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17 January 2023

Bristol Heat Network Local Development Order Planning application reference 22/05628/LDO

Summary

Bristol Civic Society recognises the importance of heat networks for decarbonising heating requirements in a densely developed area such as Bristol. They are an essential part of the route map to the city's ambition to be carbon neutral by 2030. We therefore support the principle of heat networks. Our concern with this proposed Local Development Order (LDO) is its scope and manner of preparation.

Concerns about the LDO

The LDO is modelled on permitted development rights (PDRs) for telecoms, electricity etc. These nationally-granted PDRs are, however, in general focussed on operational land owned by the undertaker, highway land or where an express planning permission has been granted for new infrastructure. This proposed LDO would (inter alia) give planning permission for development on areas of green space enjoyed by the public. This is not appropriate.

Operational activity should benefit from PDRs but we see no practical reason why planning applications for express permission cannot be made for the rollout that establishes the network, including for the construction / storage sites that will be required.

Working with, and listening to, affected communities

The importance of transparency and securing community buy-in to decisions that have significant impacts on them should be axiomatic. In this context, Simon Roberts (Chief Executive of the local energy charity, Centre for Sustainable Energy) wrote about the importance of securing meaningful consent for decarbonisation projects.¹ The focus was on onshore wind, but the central message is very relevant for the rollout of the heat network. Yet here we have an important consultation held largely over the holiday period and

¹ <https://www.cse.org.uk/downloads/reports-and-publications/policy/renewables/Towards-meaningful-public-consent-for-action-to-cut-UK-emissions-CIFF-stimulus-paper.pdf>

without, as far as we are aware, any prior engagement with relevant community organisations.

We are also surprised, given the potential scale of activity, that there isn't an emphasis on co-design (not least for any impact on green spaces) and meaningful opportunity for affected residents and interest groups to input to scheme design. The feeling of exclusion will not be helped by the provisions relating to approval of details where, in the absence of a refusal, development permitted by the order can start at "the expiry of [28] days following the date on which the application for written approval was received by the Local Planning Authority". The 28-day period should either be extended to allow for meaningful engagement with local communities or, preferably, this provision should be omitted from the order.

Engagement

We would welcome a meeting with council officers to discuss this proposed LDO before it is made.