



Pearce Planning Ltd has been appointed by Fusion Group to submit representations to the Bristol Local Plan Examination, with respect to future PBSA sites currently being explored throughout Bristol and the overall student accommodation provision in the city. Fusion Group are an extremely successful and high quality developer of purpose built student accommodation across the UK and have developed sites in Bristol previously and are in the process of negotiating land deals on other sites.

To confirm, these representations support numerous previous representations made to the Bristol Local Plan process since 2019 and to other policy documents which have been prepared by BCC during the process, which we assume were based on the principles set out in the draft Local Plan documents and so their suitability and credibility should be considered alongside the Local Plan if findings are not supportive of related policies. For ease of reference the key messages from the representations made to the documents below have been included in our updated statement:

- January 2022 – PBSA Draft SPD (SPD was placed on hold by BCC)
- January 2023 - Further Consultation Version (November 2022)
- March 2023 – Temple Quay Development Framework
- September 2023 – Bristol City Centre Development & Delivery Plan (July 2023)
- January 2024 - Publication Version (BLPPV) November 2023
- January 2025 – Broadmead Design Code

Summary of Attendance

Week 1

- 25 Feb – Matter 1 – Legal Compliance & Procedural Matters – mainly observing
- 26 Feb am and pm - Matter 2 — Housing Land Needs, Requirement and Supply
- 27 Feb am - Matter 2 — continued.

Week 2

- 4 Mar (am only) - Matter 4 –Spatial Strategy - not Green Belt.
- 5 Mar - Matters 4.1 and 4.2 – General and Central Bristol

Matter 1: Legal Compliance & Procedural Matters

Issue 1.1: Whether the Council complied with the Duty to Cooperate (DtC) in preparing the Plan

Housing Need and Requirement & Other Strategic Matters

Response - Issue 1.1 (Questions 1.1-1.6 and 1.10-1.11 specifically) - Preliminary questions issued to the Council and supplementary questions (IN3) correctly challenged the detail provided regarding the duty to co-operate and findings from the meetings with neighbouring authorities. Proposed allocations are insufficient to help achieve the unmet housing need including PBSA units, which not only provide accommodation for a specific, growing substantial proportion of the housing need, but also offers the potential to free up existing housing stock which are used as HMOs for students throughout Bristol without the required supporting facilities.



We feel that procedurally the Council has failed to properly engage with adjacent Councils and vice versa in respect of key issues. This happened during the JSP process which as we all know failed and there were several issues concerning release of land on the edge of Bristol to meet a strategic need as well as the overall strategy for delivery of the housing numbers in particular across the four authorities.

We would want to appreciate how and when the Council engaged in particular with South Gloucestershire Council to consider the housing needs for the PBSA sector. We are all aware of the presence of two universities in our great city, one focused around North and Central Bristol (UoB) and the other on the edge of Bristol's north fringe in South Gloucestershire (UWE). We can see from the papers that good engagement has taken place with UoB and they are progressing well with their city centre campus and indeed have considerably extended their land ownership and offer since the student need was defined. However, there has not been the same interaction with UWE and in our view a total disregard for the growing demand for second, third- and fourth-year students and mature or post graduate students who wish to live in the city centre of their chosen university.

I am a prime example of a UWE student who lived in South Gloucestershire for the first year but moved into a more vibrant central location in later years to enjoy the city and all it has to offer. Particularly, now public transport connectively has significantly improved there is even more desire to reside in the city centre areas and travel in to study, particularly given the reduced hours of lectures and need to obtain employment to financially supplement their learning experience.

There is equally not much to show an assessment of how much accommodation for students is provided by non-PBSA in the wider city of Bristol to serve both universities which has the associated anti-social connotations and lack of amenity and managed accommodation. If PBSA supply is limited and the proposed HMO guidance by BCC followed this will limit accommodation by other means around Bristol and this will impact on the performance of the Universities and associated economic impacts. Whilst a good deal of accommodation has been provided in the new neighbourhood at Filton Airfield, this is not as attractive as city centre living to the average student.

We are also aware of considerable delivery in and around the new city centre campus along Avon Street, in St Philips north and also now St Philips South. However, these locations will principally serve UoB students as they are the wrong side of Bristol for UWE students. There appears to be a very onerous cap on PBSA in most regeneration areas and our main concern is the limit this imposes on the potential for PBSA in central Bristol (Broadmead) and the Frome Gateway – both of which are an easy bus ride to UWE campus in Frenchay. This not only places a strain on the Universities, who have for years relied on using accommodation outside of the Bristol area in Wales and Bath but also results in the Council seeking to impose a disproportionate amount of family type housing in areas which should be providing for the young professional and PBSA markets.

Developers simply do not have faith in the demand for family housing in city centre locations due to the lack of outdoor space associated with these types of development, reflecting the higher land price and expensive development costs (e.g. de-contaminating land). It also reduces the density that can be achieved and can affect overall viability and the ability to deliver affordable housing where required. More actual units could be delivered in Bristol (applying the 1 unit per PBSA 2.5 beds).

Simply, if a duty to cooperate with South Gloucestershire had been successful then more family housing would be delivered for Bristol in this area and conversely more PBSA and young professional



smaller units would be allocated and delivered in the city to meet demand where it exists and accommodate UWE students. As matters stand, BCC need to accommodate more growth and housing in all forms by increasing densities which suits the smaller units rather than family housing. Given the stance by adjacent planning authorities. Perhaps this is why BCC seek to impose unnecessary caps on PBSA and ultimately limit units for UWE students or UoB?