



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 2: Housing Need, Requirement and Supply

Issue 2.1: Whether the Plan establishes a housing requirement figure that is positively prepared, justified and consistent with national policy (Policy H1).

Q2.1: Is the objectively assessed housing need (OAHN) for Bristol of 3,380 dwellings per annum (60,840 during the plan period) based on an approach consistent with paragraph 61 of the NPPF?

Response

Our position on this question is that BCC have not complied with Paragraph 61 and should be making greater provision based on the co-operation offered by neighbouring authorities and to meet demand where it exists. In short, to achieve the numbers BCC need to be bolder in their emerging policy framework documents in terms of densities and scale overall and use. By limiting PBSA when demand exists stifles the delivery of units and



retains more family housing in use as HMOs which are not managed properly causing associated amenity issues for neighbours and accommodation not fit for purpose.

We welcome the continued inclusion of the statement “*Manage the development of student housing to safeguard existing communities whilst supporting thriving universities by meeting student accommodation needs;*” within the supporting text to draft policy H1 (para 6.10) which sets out the ways in which the housing supply can be significantly boosted. So why impose limits to the market with maximums.

Related to this, South Gloucestershire Council (SGC) published the latest version of their New Local Plan for consultation on 13th November 2023. Within this it states that at this stage SGC have not considered the extent to which SGC may or may not be able to take any part of this unmet need. As such there is much uncertainty as to whether the plan for neighbouring authorities to accommodate any of this unmet need is a reliable solution and this places greater pressure to make the best use of sites within BCC boundaries that are capable of providing additional housing. Furthermore, in respect of PBSA the need arises in the city centre and by the campuses and so suburban locations are not appropriate.

The housing figure included within Policy H1 is the lowest of these figures, and despite this, it is still confirmed that this figure will go unmet. It is therefore imperative that the development potential and development capacities of regeneration sites, such as the land at Broadmead, Frome Gateway, Temple Meads and St Philips are maximised in order to ensure that the needs of the city are met.

Para 6.6 of the consultation document makes it clear that the council considers that the best place to meet the housing needs of Bristol is within the city; and that as much of the housing need as possible should be met within Bristol’s local authority boundary. We are supportive of this.

Q2.3: Is the requirement for an average minimum of 1,925 new homes per annum over the plan period to 2040 positively prepared and justified having regard to identified constraints, including but not limited to land availability, viability and infrastructure? In particular:

a) Is the overall capacity figure of 39,798 dwellings based on a robust assessment of potential supply (including windfalls and ‘urban potential’)? Have all available sources of land for residential development been fully considered and robustly assessed?

Response – No, we do not consider that the plan has been positively prepared and justified in order to deliver the number and type of units required. We feel that the city centre and Frome Gateway, Temple Meads and St Philips should be pushing densities and directing development at smaller units to increase the number of units provided overall. Emerging documents on design and existing ones limit the scale and mass of developments in Bristol. Whilst more recent development has been more ambitious this has partly been to do with the appeal position and lack of supply, developers have been in a stronger position, as opposed to positively planning for greater scale in the city. We feel the development allocations can be more ambitious if other policies were relaxed.

b) Does the evidence demonstrate there are no other sustainable sites for residential development within the plan area during the plan period, including sites allocated or in use for other uses?

Response – No it does not. We are aware of sites we have put forward and others have for alternative use, which are perfectly suitable for development and a good source of land for residential use but are not included (e.g. land off Kellaway Avenue, Golden Hill), Rivergate House in Temple Meads (which met with resistance during pre-application discussions to change the use from office to residential



PBSA), both of which should be released in advance of Green Belt release given its current use and would be above potential grey belt status sites.

c) *Is the Plan sufficiently proactive in seeking to maximise the delivery of residential development on appropriate sites, including those which may currently be in alternative uses (such as existing employment land)?*

Response – No it is not. Changes of use from recreation, office, industrial and retail have been resisted and not included or supported during pre-application and these sites are not included positively for residential use. There is a resistance to lose these uses and proposals often have to accommodate mixed use requests which are not always viable.

With respect to Policies DS1 to DS14 it is our view that the Council should aim higher in terms of housing delivery – i.e. treat the indicative new housing capacities in the respective policies as a minimum target to hopefully be exceeded, as opposed to a finite target. Further allocations should be made to accommodate stalled developments and the caps to certain forms of development should be removed or replaced with minimum figures for each use to ensure delivery and not overly restrict the market forces. Our representations made specific comments on DS1, DS1A and DS2 which are included below under Matter 4 (Issue 4.2).

d) *Given many allocations set out in Policy DA1 are for mixed-uses and contain only ‘estimated’ capacities, is there sufficient certainty about the scale of delivery envisaged from these sites?*

Response - We believe that there is potential to push the estimated capacities on all schemes in the city centre and look at re-addressing the balance to help meet the unmet housing numbers and in particular reallocate more sites for PBSA and residential and less for other uses. The Fire Regulations now place more stringent requirements on height and cores and with a myriad of uses this can be overly complicated and inefficient so we would advocate a simpler form of development on sites.

Q2.7: *Should the Plan set out the scale of unmet housing need and set out how the issue is expected to be addressed, including the role of other local authorities?*

Response – Yes reference must be made to where the proposed allocations will take BCC on delivery and therefore whether other sites should be considered to be included which have not made the cut and where other LPAs are required to assist. BCC should also be taking SGC’s PBSA requirements from UWE to help meet that housing demand.