

Bristol Local Plan Examination

Matter 2: Housing Need, Requirement and Supply

Written Statement prepared by Savills
on behalf of St John Ambulance
(Participant ID: 401)

Introduction

1. St John Ambulance (SJA) submits this Statement in relation to the following Issue identified under Matter 2 of the Inspector's Draft Matters, Issues and Questions:

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

2. This Statement responds to the following questions set out under the above Issue:
 - Q2.3a
 - Q2.3b
 - Q2.3c
 - Q2.4
3. St John Ambulance own the Harry Crook Centre, Raleigh Road, Bedminster, Bristol (herein referred to as 'the site') and have engaged in the emerging Bristol Local Plan in the previous Regulation 19 consultation, including making a Call for Sites submission.
4. A copy of the representations submitted during the most recent Regulation 19 ('Reg 19') consultation can be found at the following link as respondent number 401:
https://files.smartsurvey.io/3/1/O0YVB32S/236782150_20966066_3294087.pdf
5. As requested within IN4 Appendix 2, we have not repeated our Reg 19 concerns which remain outstanding but have referred to them where we feel this is helpful. This response should therefore be read in conjunction with the Reg 19 comments.
6. Since the Reg 19 consultations in November 2022 and November 2023, planning permission (ref: 23/03791/F) has been granted for redevelopment of the adjacent site, the former Amerind Grove Nursing Home, Raleigh Road, to deliver 106 new homes. This demonstrates the area will be going through redevelopment, and it is considered our site provides a further opportunity to deliver more housing.
7. Link to the planning application below - <https://pa.bristol.gov.uk/online-applications/caseDetails.do?keyVal=S1R6HJDNHTI00&caseType=Application>

Q2.3a: 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?

8. Having reviewed the Council’s own evidence base, it is clear they have not undertaken a robust assessment of potential supply, nor fully consider all available sources of land for residential development. Furthermore, they have failed to robustly assess additional sites, including the St Johns Ambulance site.
9. Documents referenced below include the Strategic Housing Land Availability Assessment (SHLAA), dated April 2024 (EVEH01) and the Housing Need and Supply Topic Paper (April 2024) (TPC004). It is noteworthy that these documents were only prepared just before the submission of the Plan, despite them being the Council’s primary source of evidence for the housing supply matter.
10. The Council’s Housing Need and Supply Topic Paper (TPC004) sets out how the Council aim to deliver the 39,798 homes across the plan period. It includes the following table of what they consider ‘sources of deliverable housing supply up to 2040’:

Source	Capacity
Areas of growth and regeneration	20,386
Planning permissions	9,087
Existing development allocations	1,381
Proposed development allocations	1,125
Green Belt locations	1,400
Small sites windfall	3,600
Urban potential	2,219
Student accommodation	600
TOTAL	39,798

11. The Council is only looking to accommodate 1,125 homes through development allocations, which equates to 2.8%. Despite several additional sites being submitted for allocation through the local plan, the Council has failed to consider these. Instead of taking a pro-active approach to the plan making process, the Council are relying on the majority, over 65%, of their housing being delivered through ‘windfall sites’ (Areas of Growth and Regeneration, Small Site Windfalls, and Urban Potential sites).

12. In answer to the second question, Appendix C of the SHLAA (EVEH01) outlines those sites which have been submitted via Call for Sites. The Council's own evidence base demonstrates they have not fully considered or assessed all sites. As aforementioned, SJA's site in Bristol was submitted as a Call for Sites submission in the Regulation 19 consultation. The reference sited is taken from the Council's SHLAA dated April 2024 (EVEH01). The site is listed in Appendix C under REP401 '*St John's Ambulance, Harry Crook Centre, Raleigh Road, Southville*'.

13. The site is assessed as follows:

REP401: St John's Ambulance, Harry Crook Centre, Raleigh Road, Southville

- *Ward: Southville*
- *Site Description:*
 - *Site is currently used as an ambulance centre. The site has direct access from Raleigh Road / Upton Road.*
- *Key Constraints:*
 - *The site has no known constraints*
- *Site Information:*
 - *Site Area: 0.3ha*
 - *Promoted for: Residential development*
 - *Density area: Inner Priority (120 dph)*
 - *Theoretical Capacity: 36 homes*
 - *Promoted capacity: 80 homes*

14. It is worth noting that the Council fail to include 'minimum net density' in their density description. There are errors in the Council's assessment as this is inconsistent with draft Policy UL2 which suggests to include the reference to minimum.

15. The Council has simply described the site, and not undertaken a robust assessment or drawn any conclusion as to whether or not it is available, deliverable or developable. The site has no known constraints, falls within Flood Zone 1 and comprises previously developed land.

16. Despite no identified constraints on the site, the Council have failed to progress it for allocation. The lack of conclusion drawn makes it impossible to understand why the Council has not progressed the site to an allocation, or accounted for it in the housing trajectory as a windfall site.

17. The lack of robust assessment is evident from the Council's response to Inspector's Document IN2 (EXA024) for Preliminary Question 18. The Inspector asked:

"PQ18. Appendix C of TCP001 [understood to be the SHLAA report (EVEH01)] includes sites that were promoted at Regulation 19 stage. Can the Council confirm whether or not those sites have been assessed using the same criteria as the allocations? Can the Council also confirm whether non-residential sites were proposed at the same stage and whether these have been assessed on this basis?"

18. The Council provided the following response:

"Appendix C of the SHLAA assesses the 13 sites submitted at the regulation 19 stage for their constraints and development potential with reference to standard density assumptions, in a manner comparable to the development allocation process. The potential future development of these 13 sites is not ruled out by the local plan. They are not subject to designations which would preclude some form of residential development. All sites promoted at Regulation 19 proposed an element of residential development, although several of the sites were promoted for mixed use development."

19. The Council considers 'the potential future development of these 13 sites is not ruled out by the local plan. They are not subject to designations which would preclude some form of residential development'. This implies they assume the development industry to bring forward sites at their own cost with associated risk.

20. St John Ambulance are a registered charity. Without any planning policy position on the site, there is significant risk and cost in progressing a planning application route. The Council are relying so heavily upon the development industry to progress windfall sites to deliver their housing provision, with over 65% of housing to be delivered through this route.

21. Appendix C of the SHLAA, one of the primary sources of evidence for the Council's housing supply, along with the Council's response to PQ18 demonstrates that they have not explored all options and the evidence underpinning the selection of sites is therefore not robust or justified.

22. In comparison to some of the other sites within the SHLAA, including those being allocated, the SJA site (REP401) is one of the only ones to not have any site constraints within the red line boundary. Given the Council's preference for brownfield land first, there is no known reason why this site has not been allocated.

Q2.3b: 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?

23. The Council's evidence base is not robust or justified. The three primary sources of evidence for their housing supply, being the SHLAA (TCP001), Sustainability Appraisal (SA) (CSD004) and Housing Need and Supply Topic Paper (TPC004) both show the Council has not assessed all options, failing to consider all development allocation options.
24. Appendix C of the SHLAA outlines 13 sites which have been submitted through previous Call for Sites processes. The supporting text for this section states *'the sites are given an initial assessment for their constraints and development potential... the sites have not been progressed to allocation and consequently do not make a contribution to the housing trajectory'*. The SHLAA does not provide any justification for why the sites were not progressed. The SHLAA draws no conclusions on any of the sites, instead only providing a brief description of the site and constraints.
25. In comparison, the Council undertook a SA assessment of their proposed allocations. They failed to apply the same methodology of assessment on the submitted sites, which demonstrates the assessment is not comparable or robust. The Council's SA was produced in 2019, four years before the submission of their local plan. There is no justification for not assessing these sites under the same SA, given the methodology was already in place.
26. As outlined in the Housing Need and Supply Topic Paper, the Council is significantly relying upon windfall sites to meet their need; comprising over 65% of their anticipated housing provision over the plan period. Suitable sites were submitted through the Call for Sites and Regulation 19 consultation process, however the Council has failed to progress them, instead assuming they will come forward via a planning application route, with no planning policy position.
27. It is worth noting that both the Topic Paper and SHLAA were produced in April 2024, just before the submission of the local plan. This questions whether the documents were either positively prepared or robust.
28. Overall, the Council has failed to provide an evidence base to show there are no other suitable sites for residential development within the plan area during the plan period.

Q2.3c: 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)?

29. No. This is shown in the assessment of the SJA site in Appendix C of the SHLAA (TCP001), whereby the Council fail to include the reference to ‘minimum density’ against the site’s capacity, demonstrating the Council are not taking a proactive approach to maximising the delivery of residential development.

Q2.4: Further to the above, the response to PQ18 refers to sites suggested as part of the Regulation 19 consultation. This concludes that development is not ruled out by the local plan as they are not in any designations that would prejudice some form of development. Does this have any implications for the estimated capacity of the City, or the assumptions made relating to windfall or urban capacity?

30. The Council’s response to PQ18 states *‘the potential future development of these 13 sites is not ruled out by the local plan’*. The SJA site falls outside of an Area of Growth and Regeneration, where the principle of redevelopment is considered acceptable. The site therefore has no policy position without an allocation, and therefore it is unclear what the Council mean by the future of these sites not being ruled out by the local plan.
31. On the one hand the Council are relying upon these 13 sites, and windfall sites, to contribute towards their housing provision, yet they are not providing any certainty or confidence for land owners to release the funds to bring forward sites. SJA are a charity and without a policy position on the site there is no incentive for them to release crucial funds to progress an application. An allocation can significantly assist with providing the confidence required for a charity to invest in relocating their assets and ensuring they meet their charity aims.
32. The Council’s calculated capacity for the city includes just 2.8% of delivery from proposed allocations. This figure alone demonstrates the Council are not doing enough to ensure certainty in their delivery. It places a minimal reliance on development allocations, instead anticipating the significant majority of housing will come from the wider development industry through windfall sites.
33. The Council’s approach is therefore not considered to be plan-led or proactive. There is an over-reliance on windfall sites in their capacity calculations, whilst a significant under-provision and under-reliance of development allocations.

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