

**Inspectors Louise Gibbons, Steven Lee,
and Benjamin Clarke**

c/o Robert Young (Programme Officer)

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Matter: 2

Representor

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Dear Inspectors,

Bristol Local Plan Review – Inspectors Matters, Issues and Questions

**Matter 2 – Housing Need, Requirement and Supply - Representation prepared by
Strutt & Parker on behalf of Structadene Group Ltd.**

Structadene Group Ltd. ('Structadene') maintains an interest in the redevelopment of two sites in the north-west quadrant of St Philip's Marsh ('SPM'), one abutting Camwal Road and one abutting Feeder Road.

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?

1. Yes.
2. The objectively assessed housing need for Bristol has been established in accordance with the NPPF2023. Using the standard method, this arrives at a figure of 2,503 dwellings per annum (45,054 dwellings between 2022 and 2040). Once the 35% cities

and urban areas uplift required under the 2023 Framework, for which this Plan is being assessed, this increases the figure to 3,380 dwellings per annum (60,840 dwellings over the plan period).

3. However, as discussed further below in our answer to Q2.5, there is no reasonable evidence put forward by Bristol City Council ('BCC') that constitute exceptional circumstances to depart from meeting the OAHN in full.

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?***

1. No.
2. The Planning Practice Guidance ('PPG') is clear that the housing need is an unconstrained assessment of the number of homes needed in an area. (Paragraph: 001 Reference ID: 2a-001-20190220). Therefore, the Local Housing Need Assessment should have no regard to the capacity of the area being assessed to accommodate the local housing need which is identified.
3. The Housing Need and Supply Topic Paper April 2024 concludes at paragraph 1.7 that, *"taking into account the land that can come forward for housing development and the places which are reserved for other necessary land uses, the level of housing development which the local plan proposes to accommodate in Bristol is 1,925 homes per year on average up to 2040"*.

4. It appears therefore that the 1,925 dwelling per annum ('dpa') figure is a figure based on capacity, rather than being based on the objectively assessed need, contrary to the PPG.
 5. Structadene contends that amongst other potential sources of supply, the growth and regeneration areas themselves could deliver more housing, and this should be explored further. The specific policies for the growth and regeneration areas should have a minimum housing target set out in each policy and Main Modifications to the Plan could address this.
 6. Whilst this can be expanded upon in emerging frameworks, it is for the Development Plan to set housing targets. Without minimum housing targets being set for each growth and regeneration area, there is a significant risk that sites which come forward are not maximising the use of the land.
 7. Furthermore, to ensure maximised delivery of homes, specific sites within the growth and regeneration areas could be allocated for residential development or mixed-use residential-led development. This will provide more certainty of housing numbers that can be delivered and may in turn allow for a greater number of homes to be provided to meet the current planned shortfall against the OAHN of 26,190 dwellings.
 8. Structadene advocates that – given Policy H1 already states that the aspiration to exceed the minimum of 1,925 new homes per annum “*where this is supported by service and infrastructure capacity*” – BCC should accelerate the redevelopment of strategic redevelopment areas to make up the difference over the Plan period, including, if necessary, by allocating more housing and building at higher densities in these areas.
- 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?**

9. Nothing to add beyond the comments made elsewhere in this representation.

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)?*

10. SPM is the largest of the growth and regeneration areas in the Plan, and as such, is a particular focus for change and development in the city, much of which is in existing employment use.

11. Policy DS3 (St Phillip’s Marsh) states under the subsection - North west St Phillip’s Marsh - that *“this location close to Bristol Temple Quarter will be developed as a knowledge based, employment led innovation area. It is suitable for higher intensity workspace/offices/ research and other more intensive forms of use appropriate to a location adjacent to the city centre.”*

12. Structadene is of the opinion that in addition to the knowledge and employment uses proposed by the policy, the north-west area of SPM is also suitable for a mix of other uses including residential and student accommodation, both of which there is acute need for. This will help maximise the delivery of residential development in a highly sustainable and appropriate location. Further representations are made in our Matter 4 Hearing Statements under Policy DS3.

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?*

13. No comment.

e) *In establishing the housing requirement, is the 15% ‘headroom’ figure justified?*

14. No comment.

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?

1. The NPPF2023 (para 72) states that an allowance for windfall sites should only form part of the anticipated supply if there is compelling evidence that such sites have consistently become available historically and will continue to be a reliable source of supply.
2. By including this quantum of windfalls (small site windfalls and urban potential) within the Plan's housing requirement (circa.14.6% of the overall supply), the opportunity for other 'windfalls' to provide additional housing over and above the anticipated supply is removed.
3. To be effective and justified, some of the anticipated windfall supply should be allocated. This will provide more certainty over delivery and allow for other 'windfalls' to add to the supply.

Q2.5: Has the Council assessed the likely effects of delivering a higher level of housing within the Plan area?

1. No.
2. The Sustainability Appraisal (SA) states “*Bristol has a growing population, above that of the national average, which is leading to high demand for new housing*”. Paragraph 11 of the NPPF 2023 requires strategic policies to, **as a minimum**, provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within neighbouring areas. Chapter 5 of the NPPF 2023 sets out that these policies should be informed by a local housing need assessment, conducted using the standard method as an advisory starting-point. Exceptional circumstances can justify an alternative approach which also reflects current and future demographic trends and market signals.

3. The SA attempts to justify the decision to discard the Standard Method +35% urban uplift as a reasonable alternative to the 1,925dpa on the basis that (1) other indicators reveal a different level of demand, and (2) that the city does not have a history of delivering such a high quantum of housing.
4. Both arguments do not constitute exceptional circumstances.
5. First, because the +35% urban uplift is an arbitrary – not evidenced – adjustment and will not therefore mirror other housing need calculations. Second, past undersupply cannot be an excuse for future under-delivery, particularly in the context of the aforementioned high demand for new housing and worsening affordability.
6. Neither of these justifications represent exceptional circumstances to depart from the Standard Method and the Council has not therefore assessed the likely effects of delivering a higher level of housing, which could meet the OAHN.
7. The Sustainability Appraisal should be amended to test a more appropriate range of reasonable alternative growth scenarios in both quantitative and spatial dimensions. If necessary, Main Modifications may then need to be made to the Plan to reflect any uplift in housing targets and/or allocations.

Q2.6: Having regard to the above, is there substantive evidence to suggest that the requirements of paragraph 11b of the NPPF, as set out above, have been met? What are the adverse impacts of seeking to meet the OAHN?

1. Please see answer to Q2.5 above.

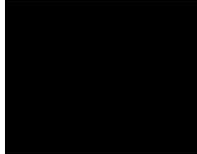
Q2.7: Should the Plan set out the scale of unmet housing need and set out how the issue is expected to be addressed, including the role of other local authorities?

1. No comment



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Yours sincerely,



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