

**BRISTOL LOCAL PLAN EXAMINATION****STATEMENT ON MATTER 2: HOUSING NEED, REQUIREMENT AND SUPPLY****Introduction**

- 1.1 This Statement has been prepared by Rapleys on behalf of the University of Bristol (UoB). It concerns Matter 2 (Housing Need, Requirement and Supply) of the Bristol Local Plan Examination, as set out in *IN4 - Appendix 1: Bristol Local Plan – Draft Matters, Issues and Questions (MIQs)* issued by the Inspectors in December 2024.

**UoB Responses**

- 1.2 Relevant Matter 2 questions are addressed in turn below.

*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?*

- 1.3 The UoB has concerns about the Council's calculation of student housing need, which is a subset of overall housing need. In particular, the UoB contends that:

- The Council's evidence fails to recognise the current and historic long-term undersupply of purpose-built student accommodation (PBSA) in the city and makes no provision at all to meet this accumulated unmet need.
- The Council's presumption that planned growth in Bristol UWE student numbers will not increase bedspace demand in Bristol is unjustified and unsound.

- 1.4 It is also noted that, while the housing target of 1,925 new homes per annum is expressed as a minimum requirement, the student bedspace figures set out in policy H7 and various "DS" policies, are expressed as maximum limits. This approach is considered to be in conflict with the NPPF, which seeks to significantly boost housing supply and promotes minimum targets. In particular, paragraph 61 of the NPPF refers specifically to the "minimum number of homes needed" and paragraph 62 states that "*housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).*" The imposition of bedspace limits also conflicts internally with the policy H7 objective to ensure the "*growth in student population is matched by the provision of purpose-built accommodation.*"

- 1.5 The above issues are addressed in greater detail in the UoB's written statement concerning Matter 7 (and policy H7 in particular). What should be noted here, is that a failure to properly account for student housing need, and to impose bedspace limits rather than targets, could undermine the credibility and soundness of the wider evidence base pertaining to overall housing need and supply, given that student accommodation is a component part.

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*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?*

- 1.6 As above, the UoB contends that the Plan fails to account for existing unmet need for PBSA in the city and ignores the demand for student housing from additional Bristol UWE students. The UoB's preference would be for these points to be recognised and incorporated in an updated student housing need assessment, and then for relevant policies to be amended so that minimum targets are set to meet requirements.
- 1.7 If the Inspectors are minded to accept the Council's case that limited capacity necessitates a reduced target, then the Plan should set out the scale of unmet housing need, including student housing need, and identify how the issue will be addressed.

**Word count** = 584 words.