



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 4: Development Strategy and Site Selection Process

Issue 4.1: Whether the development strategy and strategic policies of the Plan are positively prepared, justified, effective and consistent with national policy?

Q4.1 to 4.6

Response – We have been engaged on a number of Framework evolutions and it is imperative that these guidance documents are just that and do not overly restrict the ambition and requirement to deliver the sufficient housing levels and PBSA use in the city and be realistic about the delivery of affordable workspace and retention of commercial or retail functions, for example in Broadmead or Frome Gateway.



Whilst the masterplan documents produced so far are useful, they have currently delayed and stifled delivery whilst waiting for the preparation. This has occurred in Temple Meads, St Philips, Broadmead and Frome Gateway. We previously referred to the need for these to be flexible and to not restrict development coming forward and encourage ambitious plans of city centre scale.

UL1: Effective and efficient use of land

We support the ambition in draft policy UL1 that development proposals should develop land to its optimum density and encouraged to make efficient use of land.

Issue 4.2: Are the policies relating to Central Bristol justified, effective and consistent with national policy?

Q4.7: Is Policy DS1 justified, consistent with national policy and effective? In particular: Development up to 2040

a) Would the policy be effective in strengthening the role of the City Centre as a focus of regional importance and is the approach justified?

b) Having regard to paragraph 3.1.4 which indicates that the overall area has the potential to accommodate thousands of new homes, is the anticipated housing capacity of 2,500 set out in paragraph 3.1.10 justified. To be effective, should the policy identify the expected level of housing delivery in this area?

c) Is the policy sufficiently clear in defining what uses would be acceptable within the City Centre area?

d) Is it clear what level of student accommodation is expected to be provided in the overall area and is this justified?

Response – We do not believe DS1 is justified and should be more ambitious and flexible in terms of the nature of residential uses and PBSA delivery in this key area of growth given its accessibility to both universities. It will be a lost opportunity to stifle growth in the most central area of the city. The policy should be positively prepared and encourage the delivery of any housing type and at a scale befitting its city centre status. We feel a minimum figure should be included rather than maximum capped figures.

The existing adopted BCP35 policy includes PBSA as appropriate however the implementation of this policy through development management has restricted a PBSA proposal during pre-applications. The policy should be clearer and then implemented as such. In particular, Q4.7d on PBSA, it is not clear what level is required and it is not justified. This area can provide suitable sites for PBSA serving both universities and the drafted cap is therefore totally inadequate. The whole area will need to be repurposed given the shift away from retail and housing including PBSA should be the primary use. Our previous representations confirmed a support for the mix of uses including PBSA but not the level suggested. It should be much higher.

Policy DS1: Bristol City Centre

We support that this policy promotes a mix of uses that includes residential and also PBSA, but please note our comments on policy H7 in our Regulation 20 representations.



Q4.8: Are the requirements set out in Policy DS1 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

c) Is the approach to tall buildings consistent with Policy DC2 and is it justified within this area?

Response - Please see our comment on Matter 13 below. In short, no we feel the emerging design code document is confusing on scale and mass and the location of tall buildings partly due to the wish to retain the quadrant buildings as a focal point. This area could deliver a significant amount of housing among other uses and this would help achieve the required numbers.

Q4.9: Is Policy DS1A justified, consistent with national policy and effective? In particular:

a) Is it necessary for the policy to state what development up to 2040 will include, to be consistent with the other City Centre DS policies?

b) Will the policy be effective in creating a mixed-use city centre neighbourhood?

c) Is the policy sufficiently clear in defining what uses would be acceptable within the area?

d) Is the boundary shown on the diagram at page 19 of the Plan appropriately defined?

e) Having regard to the Council's proposed main modification for Policy DS1A proposing a change to this part of the policy in response to PQ32, is this necessary for soundness? Is it justified to expect major development to provide a minimum of 10% of ground floor space for community or cultural use? Has this requirement been subject to viability testing and if not, why not?

f) Paragraph 3.1.20 refers to Castle Street/Queen Street as being allocated in the Bristol Central Area Plan but that it is now identified as a potential development site 13 in the City Centre DDP. Is this approach justified and it will it be effective in delivering the rest of the site?

Response – Our comments are the same as DS1 in that we feel the policies should be more ambitious in terms of scale and housing delivery including PBSA. We feel that it is overly prescriptive in land use terms and scale and mass and the design code issued for Broadmead is not ambitious enough and should follow the outcome of the Local Plan core policies. Previous response to the consultation is set out below:

DS1A: Bristol City Centre – Broadmead, Castle Park and the Old City

This is an additional policy compared to the March 2019 version of the local plan review. We support the aspiration for a more efficient use of land and a greater mix of uses to be encouraged within Broadmead, including the development of new homes, which should specifically include PBSA. We also welcome that tall buildings in the right setting and right design may be appropriate. This should be encouraged and more positive setting minimum scales to increase Bristol's contribution to housing delivery.

We do however have concerns and object to the inclusion of a blanket requirement for major development to contribute a minimum of 10% of ground floor space suitably fitted out for the use of community and/or cultural organisations and groups at an affordable rent. This will not always be appropriate or feasible, depending on the individual circumstances of the development, and therefore the words "where appropriate and feasible" should be added to this paragraph. To introduce this as an absolute requirement will lead to dead frontages at night potentially and affect viability. Off-site payments may also be of use here in lieu of delivery on every site to provide flexibility.



Q4.10: Are the requirements set out in Policy DS1A justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

- a) Is the requirement to create new routes through urban blocks and restore historic street patterns justified and will it be effective?**
- b) Are the requirements in relation to built and cultural heritage consistent with Policy CHE1 and national policy?**
- c) Is the approach to tall buildings consistent with Policy DC2 and is it justified within this area?**
- d) Are the requirements set out under the remaining place principles clear and unambiguous, such that it would be evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?**

Response – No DS1A is not justified being overly prescriptive and could stifle the delivery of much needed housing through the retention and provision of more routes through development areas. We are unsure having seen the design code document whether it is consistent in its application of DC2 on tall buildings and so would question this approach in the Local Plan.

Q4.11: Is Policy DS2 justified, consistent with national policy and effective? In particular:

- a) Is the policy sufficiently clear in defining what uses would be acceptable within the area?**
- b) Is the boundary shown on the diagram at page 22 of the Plan appropriately defined?**
- c) Is the anticipated housing capacity of 2,500 set out in paragraph 3.1.26 justified? To be effective, should the policy identify the expected level of housing delivery in this area?**
- d) Is it clear what level of student accommodation is expected to be provided in the overall area and is approach this justified?**

Response – Our previous representations are noted below and still apply. This area should include plans for UoB expansion of their operation given their land holdings in the area which will result in a greater amount of PBSA needed. There has been a number of consents issued for PBSA during the Local Plan process but there is still insufficient delivery and identified sites for this use. We believe that there should be a greater number of PBSA focused developments and BtR and less family housing. We also challenge the capacity limits set and believe this area can deliver much more and the BCAP35 policy allocation indicates the area as suitable for PBSA yet we have been resisted in the change of use of an office building which would have created a more balanced mix of uses in that specific area (The Friary)

DS2: Bristol Temple Quarter

Draft Policy DS2 confirms that Bristol Temple Quarter is proposed to be comprehensively developed for a wide range of uses in a new city quarter. This will include additional high-quality office and flexible workspace, new homes with a mix of types, sizes and tenures, education facilities including a new campus for University of Bristol and associated student accommodation.

This general aspiration and proposed mix of uses for this area is supported, especially that it will include new homes in a mix of types, including PBSA, although please note our representations in relation to policy H7. We also support the inclusion within the 'Place Principles' that "tall buildings of an appropriate design and setting may be appropriate as part of the development mix." We would seek

BRISTOL LOCAL PLAN EXAMINATION

Representations on Matters covered during Weeks 1 -3 of the Examination

7th January 2025 – For Fusion Group



a stronger aspiration or requirement for this type of development, given the scales being consented now in St Philips area (Albert Road).