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Bristol Draft Local Plan – Examination in Public

Matter 4 Statement: Development Strategy and Site Selection Process

Issue 4.1:

General Strategy Questions

Q4.1: Are the specific areas of growth and regeneration justified, consistent with the development strategy and the Plan's overall Vision and Objectives?

Dandara Living support the general approach of Bristol City Council of identifying specific areas of growth and regeneration. Dandara Living, do however, have concerns over the general approach of the development strategy which does not seem to identify the objectively assessed need for the city, before setting out how these delivery requirements will be met through these specific growth and regeneration areas, as set out within our Regulation 19 Representation (paras 3.1-3.3) and subsequent Matter 2 Statement. In this respect the strategic policies are not justified, effective or consistent with the Framework.

Q4.2 Several of the policies for areas of growth and regeneration refer to development having to 'accord' with regeneration frameworks. Notwithstanding the Council's response to PQ9, is it justified or effective for proposals to have to 'accord' with documents that do not form part of the development plan?

Whilst Dandara Living support the general approach of the Council in identifying the growth and regeneration areas and supporting these areas with associated Frameworks or SPDs, it is not considered justified to have to 'accord' with these documents given that they would not form part of the Development Plan. Dandara Living have experience of development within three regeneration areas – Temple Quarter, Central Bedminster and Frome Gateway – all of which have regeneration frameworks or masterplans. The direct experience is that these

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documents need to be applied flexibly and respond to changing circumstances. The Council themselves often do not want development to accord with a framework and have requested changes resulting in developments which would effectively not 'accord' with a framework or masterplan. A generic requirement to 'accord' could therefore result in inconsistency in decision making.

Dandara Living's Matter 2 Statement specifically sets out in detail that the capacity of development is not appropriately reflective of densities actually coming forward within the City. A direct example would be Dandara Living's development at Clarence Road which has a density of 544dph though the Temple Quarter Development Framework states new developments should propose a density in line with draft Policy UL2, which would be 200dph. Whilst it is acknowledged this is a minimum, there is a significant different between this minimum and what is considered acceptable - by nearly three times. This is one of numerous examples across the city. This requirement to 'accord' with a framework could therefore significantly impact the overall level delivery of development and be inconsistent with the Development Strategy.

It is considered that the wording 'accord' should be deleted and replaced with 'have regard to' a regeneration framework, which will form a material consideration in the decision making process once published by BCC.

Q4.3: Several of the policies for areas of growth and regeneration refer to comprehensive or co-ordinated forms of development. The response to PQ28 states that this would be guided by masterplans or development frameworks and established through design and access statements. Having regard to this, are the relevant policies sufficiently clear and unambiguous, such that it would be clear to either decision makers or applicants what would be expected on an individual site?

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Dandara Living do not consider that the place-making principles of policies for the areas of growth and regeneration are effective in terms of being clear and unambiguous for individual sites. It is considered that the general requirement for development proposals to be expected to demonstrate that opportunities have been sought to progress more comprehensive forms of development is unjustified and unrealistic given the multiple landownerships within the majority of the regeneration areas. This will inevitably only lead to delays in the delivery of development and appears to have been generically added into all the Development Strategy policies for the regeneration and growth areas with no real justification. The role of the frameworks or masterplan is to ensure coordinated development. It is therefore considered that this expected requirement is either removed from policy or amended with the word 'expected' to be replaced with 'encouraged'.

Q4.4: The reasoned justification for several policies refer to potential housing capacity figures. The response to PQ23 confirms that these are not meant to be a target or a requirement. Notwithstanding this, are the anticipated capacities justified? Without a requirement for each area, and no specific allocations within any of the areas, will the relevant policies be effective in delivering the anticipated levels of housing?

As set out within Dandara Living's Regulation 19 Representation (at paragraph 3.9) there seems to be an inconsistent approach across the growth and regeneration areas with some policies having anticipated capacities and others not. Dandara Living object to this approach as it has not been justified and the capacity figures are not formulated from a robust evidence base or assessment as detailed in both Matter 2 and Matter 12 Statements. As such, there is no robust evidence to demonstrate the ability to deliver the housing target, within specific regeneration areas or across the City as a whole or justify a target so significantly below identified housing needs.

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Given the draft Local Plan is reliant upon the growth and regeneration areas to meet the majority of housing needs for the City, it is unclear why these areas have not been appropriately assessed, provided site specific allocations and set specific area housing targets to ensure that the policies are effective in meeting the housing needs of the City.

Q4.5: Several of the policies for areas of growth and regeneration set out the expectation for a range of uses to come forward over the plan period. Other than for housing (as set out above) there is no indication in any policy or reasoned justification as to the scale of development expected. Are the relevant policies sufficiently clear as to what type and scale of development is envisaged?

Dandara Living do not consider that the policies associated with the areas of growth and regeneration are sufficiently clear as to the type and scale of development that is envisaged within these areas, other than they should be mixed use. Instead, the approach would appear to 'pass' this level of detail to be established by further details set out within in frameworks and masterplans. Many of which are already in place and adopted for decision making, despite there being no up to date development plan or adopted targets for housing or other land uses. Effectively, a 'bottom up' approach is determining strategic planning policy in relation to housing targets, capacity and land use within regeneration areas. In order for these policies to be effective and positively prepared, it is considered that the type and scale of development for each growth area should be set out strategically within each Development Strategy policy, which has been informed by a robust evidence base an analysis.

Q4.6: The reasoned justification for several of the policies for areas of growth and regeneration include reference to possible housing densities. Are these justified and, to be

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effective, should they be included in policy? How do these densities relate to other relevant policies, such as policies UL1 and UL2?

Dandara Living have set out within their Regulation 19 Representation (paras 5.1-5.2) and subsequent Matter 12 Statement as to why the housing densities used within the draft Local Plan and specifically those set out within policies UL1 and UL2 are not justified and are too low given Bristol's urban environment, housing need and consistency with densities actually coming forward within Bristol. They should therefore not be included within the growth and regeneration policies unless policies UL1 and UL2 are modified.

Issue 4.2:

Policy DS3 St Philip's Marsh

Q4.13: Is Policy DS3 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?

Yes, it is considered that it is clear what uses would be acceptable within the area. However, as set out above, the quantum of those uses is not clear which makes the policy less effective and raises questions as to whether the overall development strategy approach can be considered justified and positively prepared.

b) Is there an anticipated housing capacity for this area and if not, why not? To be effective, should the policy identify the expected level of housing, office and employment delivery in this area?

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Policy DS3 does not include a housing capacity of target within the policy wording or accompanying text. The policy should identify an expected minimum target for housing and employment uses, based on appropriate site analysis and capacity testing, in order to be effective and positively prepared.

c) Is the boundary shown on the diagram at page 25 of the Plan appropriately defined? North west St. Philip's Marsh?

Dandara Living consider that this diagram is not required to define a boundary to make Policy DS3 effective as the boundary is clearly defined on the policies map and therefore the diagram is not required.

d) Is the aspiration for this area to be a knowledge based, employment lead innovation area justified having regard to the evidence base, and will the policy be effective in this regard?

The overall approach to sub areas is not justified or demonstrated to be the most effective strategy. Specifically in relation to North West St Philip's Marsh, whilst the location of knowledge based uses close to Temple Quarter could be advantageous, North West St Philip's Marsh is suitable for a mix of uses including residential and student accommodation, due to its sustainable connections to the wider city centre. This has been established by recent permissions granted in this area, which again provides examples of conflict with the need to 'accord' with frameworks and masterplans. The lack of overall targets or capacities for land uses across St Philip's Marsh and the associated division of the area for different land uses results in an ineffective and confused strategic approach to the regeneration of this area. There is

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a lack of justification within the policy or evidence base as to what specifically is a knowledge based or innovative use and the overall demand and target that is specifically required within St Philip's Marsh. The objectives of the policy are unclear. Notwithstanding, a mix of uses would also ensure overall diversity of use and activity within this area.

Policy DS5: Frome Gateway

Q4.17: Is Policy DS5 justified, consistent with national policy and effective? In particular:

a) Is the policy sufficiently clear in defining that uses would be acceptable within the area?

Yes, it is considered that it is clear what uses would be acceptable within the area. However, as set out above, the quantum of those uses is not clear which makes the policy less effective and raises questions as to whether the overall development strategy approach is justified.

b) Is the anticipated housing capacity of 1,000 set out in paragraph 3.1.42 justified? To be effective, should the policy identify the expect level of housing delivery in this area?

No, as set out within Dandara Living's Regulation 19 representation (paras 3.9-3.10) and Matter 2 Statements the capacity within all the Development Strategy policies it not based on robust, up to date evidence. Therefore the 1,000 home capacity for Frome Gateway is similarly not appropriately justified and does not represent positive planning for housing need as this is based of density assumptions that are too low. The capacity of housing should increase in line with higher densities for the area

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following an appropriate and up to date capacity assessment of the sites within each regeneration and growth area.

c) Are the 500 bedspaces for student accommodation justified?

No, as set out within Dandara Living's Regulation 19 representation (paras 3.8), the 500 bedspaces which is currently drafted as a cap has not been justified and should not be included within the policy. Dandara Living do not consider that the overall requirement for student accommodation has been adequately planned for, to meet overall needs, which will be further addressed in the Matter 7 Statement. Policy DS5 should be flexible to be able to respond to development needs. Draft Policy H7 has the ability to manage PBSA proposals and therefore a cap within the bedspace capacity figure is not justified. Policy DS5 should be amended to state "at least 500 bedspaces" and the overall figure reconsidered as will be demonstrated in Matter 7 Statement.

d) Is the boundary shown on the diagram at page 31 of the Plan appropriately defined?

Dandara Living consider that this diagram is not required to define a boundary to make Policy DS5 effective as the boundary is clearly defined on the policies map and therefore the diagram is not required.

Q4.18: Are the requirements set out in Policy DS5 justified, consistent with national policy and would and would they be effective in securing sustainable development? In particular:

- b) In respect of housing provision i) is the mix of homes set out in paragraph 3.1.43 justified and ii) is the need for accessible and adaptable homes justified and is it consistent with Policy H9? Is there a need for the policy to reflect both these requirements.**

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No, as set out within Dandara Living's Regulation 19 representation (para 3.9), the requirements for a specific mix of homes is not justified. The evidence base does not justify there only being a requirement for 3 and 4 bedroom homes in Frome Gateway and it is unclear why a specific mix is referenced in Policy DS5 and none of the other Development Strategy policies. Therefore, this paragraph should be deleted.

- c) Are the requirements set out under the remaining place principles (design, pedestrian and cycle links, mixed uses, green infrastructure) and transport and flood risk, clear and unambiguous such that it would be evidence to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?**

The general principles are set out but clearly reliant on the further detail being provided by the regeneration frameworks and masterplans. This ability to deliver these requirements is therefore reliant on robust and effective frameworks and masterplanning.

Word Count – 2,363

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