



## BRISTOL LOCAL PLAN EXAMINATION

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

7<sup>th</sup> Jan 2025

Pearce Planning Ltd has been appointed by Orangestar Capital (Globe Bristol) Limited to submit representations to the Bristol Local Plan Examination, with respect to sites at Globe House, Eugene Street and 30-64 Pennywell Road. To confirm, these representations support previous representations made to the Bristol Local Plan Publication Version (BLPPV) November 2023. Our representations are set against questions posed by the Inspectors as set out below.

### **Matter 4: Development Strategy and Site Selection Process**

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

##### **Q4.17: Is Policy DS5 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?**

Response – The current policy wording of draft Policy DS5 states that the area will be developed as a new mixed-use neighbourhood. Development will create a mixed and inclusive community with a diversity of land uses providing opportunities to live, work, take leisure and access services. In broad terms, this policy aspiration is supported.

##### **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 expected level of housing delivery in this area?**

Response – In our view, this identified capacity is not sufficiently justified. This is based on emerging schemes in the area which, if found to be acceptable against other Plan policies and consented, would come close to hitting this target already. As such, we are of the view that the Frome Gateway area is capable of delivering a greater number of homes than identified in Policy DS5. This area is key as it is a brownfield location in a highly sustainable area adjacent to the main city centre. Given the Council's overall housing delivery position against need, it is our view that the Council should seek the delivery of a greater number of dwellings through Policy DS5.

We've noted the Council's response at page 36 of the *Brief responses to main issues raised in representations to Local Plan Publication Version* document that "The capacity of 1,000 homes suggested by the explanatory text is an estimate. It is not a cap and would not impede the development of a higher number of homes where supported by service and infrastructure capacity." This response is welcomed but it has not been reflected in recent discussions direct with officers.

##### **c) Are the 500 bedspaces for student accommodation justified?**

Response – Pursuant to Policy H7 (Managing the development of purpose-built student accommodation), it is our firm view that the 500-student bed allocation for the Frome Gateway area is too low given the area's proximity to the City Centre. The area is capable of accommodating 2-3 separate purpose-built student accommodation (PBSA) developments in our view, which if set out appropriately would not result in an overconcentration of PBSA and would greatly assist in boosting



the vitality of the area. At a minimum, most PBSA schemes are 300 bed spaces or above, which could thus be facilitated if the overall cap were to be increased to 1,000 – 1,250 bed spaces. Furthermore, this area would be a prime location for PBSA targeted at UWE students, given its proximity to the Frenchay Campus.

**d) Having regard to the Old Market Neighbourhood Development Plan, is the Policy DS5 justified, and will it be effective in delivering the aims of the Neighbourhood Plan and the aspirations of the Policy DS5?**

Response – Yes, we consider that Policy DS5 is broadly consistent with the OMNDP

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

Response – Yes, we consider this to be so.

**f) Is the aspiration to deliver logistics provision adjacent to the M32 J3 justified, and will the policy be effective in this regard? What evidence is there on its potential impact on the M32?**

Response – We have not considered this matter in detail but, insofar as we are aware, the proposed logistics hub is justified.

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

**a) Are the requirements relating to Newfoundland Way and the underpass (bullets 3,4,5 and 6) justified and will they be effective?**

Response – We would query the potential for Newfoundland Way to be ‘enhanced as a mixed-use city street’ given the level of traffic on the M32 entering Bristol. That said, we would wholly support the aspiration to provide an improved approach into the City Centre for all users.

We have been involved in discussions about the provision of a new bridge across the River Frome in the context of our client’s site at Globe House on Eugene Street. Notwithstanding the potential cost implications for our client’s emerging scheme at 30-64 Pennywell Road, the rationale for a new bridge is understood and supported.

Lastly, the aspiration to provide enhanced links with natural surveillance from new frontage development is wholly supported.

**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.**

Response – The rationale for the proposed mix of homes is understood but we are unconvinced that this housing mix can viably be delivered on privately developed mixed use schemes due to overall



viability considerations. Build costs continue to rise with inflation, which is having a substantial impact on viability as well. Accordingly, it is our view that Policy DS5 should acknowledge that the proposed mix will only be sought where it can be demonstrated that scheme viability and delivery would not be negatively impacted, as evidenced through an appropriate viability appraisal. The mix can be retained in the policy but from our perspective it will be an 'aspirational mix' as such, as we are of the view that it will be unachievable in most instances.

**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 evident to a decision maker how to react to a proposal, and will they ensure the aspirations of the policy are met?**

Response – The remaining place principles are broadly supported. In particular we would call the Inspectors' attention to this excerpt:

*“Development in Frome Gateway will be expected to make efficient use of land and will be of a scale and design appropriate to Frome Gateway’s city centre location.”*

In our view, this excerpt supports our assertion that the overall housing target for the Frome Gateway area should be higher as (1) this would help to ensure that an efficient use is made of any sites that come forward and (2) given the area's location in the city centre, taller forms of development should be encouraged where justifiable against other planning policies.