

BRISTOL LOCAL PLAN EXAMINATION**STATEMENT ON MATTER 4: DEVELOPMENT STRATEGY AND SITE SELECTION PROCESS****Introduction**

- 1.1 This Statement has been prepared by Rapleys on behalf of the University of Bristol (UoB). It concerns Matter 4 (Development Strategy and Site Selection Process) 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.

Questions and UoB Responses

- 1.2 Relevant Matter 4 questions are addressed in turn below.

General Strategy Questions

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?

- 1.3 The Councils response to PQ23 states:

The figures are not a target or requirement. They represent an estimate for each area which the policy facilitates. The policy is intended to enable the level of development suggested by the estimate.

Where possible this estimate is derived from masterplans and development frameworks being prepared for each area. In other cases they are capacity-based figures based on the best available information such as the urban potential assessment. Further information is set out in Appendix A of the SHLAA report (EVEH01).

- 1.4 The student accommodation figures set out in policies DS5 (up to 500 student bedspaces) and DS8 (up to 1,600 bedspaces) are as expressed as maximum limits. Other policies, including DS1, DS2 and DS3 indicate that student accommodation is an acceptable use for the relevant area, and refer to policy H7.
- 1.5 The UoB has serious concerns about the soundness of Policy H7, including the calculation of student housing need, the calculation of bedspace limits, and the imposition of bedspace limits in principle. These are set out in the UoB's representations to the Reg 19 Local Plan (January 2024) and supplemented by the UoB's written statement concerning Matter 7.
- 1.6 Given its position on policy H7, the UoB considers that the student bedspace capacities referenced in the "DS" policies are unjustified, and that they will be ineffective in helping deliver sufficient student accommodation to address the existing and historic long-term undersupply, and future demand.

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Policy DS1: Bristol City Centre

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

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?

- 1.7 The UoB's main campus (Woodland Road), Clifton campus and new Temple Quarter campus are all located within the defined city centre. They include the bulk of the UoB's teaching and administrative facilities, as well as various halls of residence. As a result, the UoB, its staff and students are key contributors to the identity, environment and economic prosperity of the city centre, as well as the wider city and region.
- 1.8 A recent study into the economic impact of the UoB by Oxford Economics¹ estimated that, in the academic year 2022/23:
- The UoB directly contributed £612 million of GVA and employed 9,530 permanent workers, of which £596 million and 9,280 workers were in Bristol itself².
 - The UoB spent £273 million procuring goods and services and £429 million on compensation to staff, which stimulated a further £143 million of GVA and 1,950 jobs through the indirect (supply chain) and induced (wage consumption) impacts.
 - The UoB's 30,000+ students and visitors generated an additional £318 million of GVA and 5,270 jobs across the city.
 - Overall, the UoB, its students and visitors stimulated £1.06 billion of GVA and facilitated 16,510 jobs across the Bristol economy. This equates to 5.1% of Bristol's entire GVA contribution and 4.9% of all jobs across the city.
 - Widening the analysis to the West of England Combined Authority (CA), the UoB contributed £1.13 billion in GVA and 17,420 jobs.
 - The UoB's graduates in the academic year 2022/23 added £768 million to the UK's human capital stock.
- 1.9 Drawing on the UoB's projected expansion to over 35,000 students, and assuming that the operations of the University increase in proportion, the report indicates that the University's local economic footprint will increase to £1.17 billion of GVA and 18,210 jobs across Bristol by the academic year 2028/29—a £116 million and 1,700 job increase on the academic year 2022/23. It should also be noted that the UoB

¹ *The Economic Impact of the University of Bristol: An Assessment of the University's Contribution to the Bristol, West of England and UK Economies* (December 2024)

² For reference, the Office of National Statistics estimates that around 252,000 people (aged 16 and over) were employed in Bristol in the year ending December 2023.

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intends to expand to 42,000 FTE students by 2039/40, which would bring with it further – and considerable – economic gains.

1.10 Another study by Oxford Economics into the social impact of the UoB³ found:

The University of Bristol facilitates a range of positive social impacts. The University attracts thousands of students from among the most-deprived parts of the country, and many of the businesses it procures goods and services from similarly operated in less prosperous areas, helping to tackle economic inequality by supporting skills and economic activity in these areas. The University's workforce is relatively ethnically diverse and employs more females and full-time employees than economy-wide averages. The University also facilitates wellbeing through student volunteering activities and its civic engagement. Volunteering by students at the University of Bristol has positive impacts on wellbeing, through a variety of channels and schemes, both within Bristol and further afield. The University's civic engagements align with the goals published in its strategy to be a global civic university with transformative power. The Universities engagements are far reaching and diverse, and improve wellbeing through supporting positive action on climate, social justice, educational inequality, health, and cultural issues. Furthermore, staff members at the University have a wellbeing impact through their volunteering and their service to the boards of local institutions.

1.11 As per the responses to Q4.4 and Q4.7(d), and the UoB's written statement on Matter 7, the UoB is concerned that the DS1 approach of "carefully managing" PBSA in accordance with policy H7 will:

- Fail to address the existing PBSA shortage
- Constrain the supply of PBSA units
- Further raise PBSA rents (which are already extremely high) through supply and demand principles
- Undermine the attractiveness of Bristol as a destination for students
- Undermine the competitiveness of the UoB relative to other Russell Group Universities.
- Unnecessarily restrict the growth potential of the UoB
- Reduce the economic and social benefits the UoB could otherwise deliver, were a more supportive policy adopted.
- Exacerbate inequality in access to higher education
- Coerce student housing to fringe areas of the city, which would result in a less sustainable, more travel & carbon intensive, pattern of living, which could also be more disruptive to traditionally residential areas.

³ *The Social Impact of the University of Bristol* (December 2024)

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1.12 As per the UoB's response to Q4.7(e), there is also concern that the Council's decision not to carry forward the "protection" element of adopted policy BCAP11 – and potentially to retire SPD11 – would further undermine the UoB's position.

1.13 Taking into account the significant economic and social benefits derived from the UoB and its students, as well as the potential for further benefits associated with its expansion plans, the UoB is concerned that Policy DS1, in conjunction with Policy H7, will be ineffective in strengthening the role of the City Centre as a focus of regional importance. Indeed, the UoB is concerned that the current approach could harm the attractiveness of Bristol as a destination and constrain its potential growth and prosperity.

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

1.14 The policy does not set a target for student accommodation in the city centre area. Instead, it refers to policy H7, which sets student bedspace limits for UoB sites and defined growth and regeneration areas, and sets local imbalance thresholds for other areas. As set out elsewhere, the UoB has serious concerns about the soundness of policy H7, including the calculation of student housing need (which fails to recognise existing and historic long-term undersupply), the principle of using bedspace limits (instead of targets), and the bedspace limits themselves (which are unsound and have not been robustly justified).

e) i) Will the policy be effective in consolidating and expanding University of Bristol and Bristol Royal Infirmary sites? ii) Paragraph 3.1.13 refers to additional 'policy' detail being provided on university and hospital development as supplementary planning guidance (masterplans or other agreed documents). Is this approach justified and consistent with national policy?

1.15 Policy DS1 fails to carry forward the "protection" element of adopted policy BCAP11, which seeks to prevent development that would impede the consolidation or expansion of university or hospital facilities on their respective sites. For reference, BCAP 11 states:

Development that would impede the consolidation and expansion of University and hospital facilities within the precincts will not be permitted.

1.16 The UoB requests that this wording be carried forward to Policy DS1. Without it, the policy would be potentially harmful to the UoB and its significant economic contribution to the city, and thereby unsound and in conflict with paragraphs 81 & 82 of the NPPF.

1.17 The UoB welcomes the Council's suggested main modification to Policy DS1 and the proposals map, which will help clarify the extent of UoB sites affected by the relevant policy wording.

1.18 It should be noted that policy BCAP11 is currently supplemented by SPD11: University of Bristol Strategic Masterplan. The status of this SPD following adoption of the new Local Plan and deletion of BCAP11 is unclear. Clarity on this matter is requested. An amendment to the supporting text to the policy should address this issue.

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1.19 Paragraph 3.1.13 of the explanatory text to Policy DS1 states:

Additional policy detail regarding university and hospital development may be added as supporting planning guidance in the future in the form of masterplans or other agreed documents.

1.20 The inclusion of this wording is welcomed by the UoB, who is eager to engage with the Council to deliver new planning guidance and masterplans for its sites. However, the UoB contends that SPD11 should not be retired until such time as a new / updated SPD – prepared with the input of UoB - is adopted. This approach would avoid a policy “void” and ensure suitable guidance remains in place to inform development on or near University sites.

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

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

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

1.21 The UoB’s concerns about policy DS1A are unchanged from the representations submitted at Reg 19 stage (January 2024). In short, the UoB objects to the imposition of a 750 student bedspace limit in the Broadmead area and urges the Council to fully exploit the opportunity to deliver high-density, high-quality development in this sustainable and relatively unconstrained area. For the reasons set out in previous representations and supplemented in the separate written statement on Matter 7, the bedspace cap is unsound, both in principle (because it is a maximum limit rather than a target) and the level at which it has been set (the area is capable of accommodating more than 750 bedspaces).

1.22 In summary, the Broadmead area (as covered by DS1A) is considered to be capable of accommodating more than 750 bedspaces for the following reasons:

- There is a demonstrable lack of supply of / unmet demand for additional student accommodation in the city, as evidenced in previous representations and the UoB’s written statement concerning Matter 7.
- 750 bedspaces – which the LPA quantifies as 300 dwellings for the purposes of housing completions – represents a maximum of 10.7% of envisaged housing delivery in the area (at least 2,800 dwellings). This is low compared with other city centre locations and represents under-provision on a highly sustainable site.
- The existing concentration of students and HMOs in the area is low, particularly in Broadmead, as shown on the Council’s Pinpoint website (see Figure 1).
- Broadmead is ideally located to accommodate students – and relatively high concentration of students - being mixed use in nature and in close proximity to higher education facilities.

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- There are numerous development blocks with main road frontages that are ideal for student accommodation at upper floor level (and less suited to family housing), including those fronting the busy thoroughfares of Bond Street and The Haymarket.
- The proposed mixed-use redevelopment of the Galleries (ref. 24/01850/P), which includes up to 750 student bedspaces, could singlehandedly exhaust the student bedspace limit before any other sites come forward. A resolution to grant planning permission was made on 29th January 2025 in respect of this development.

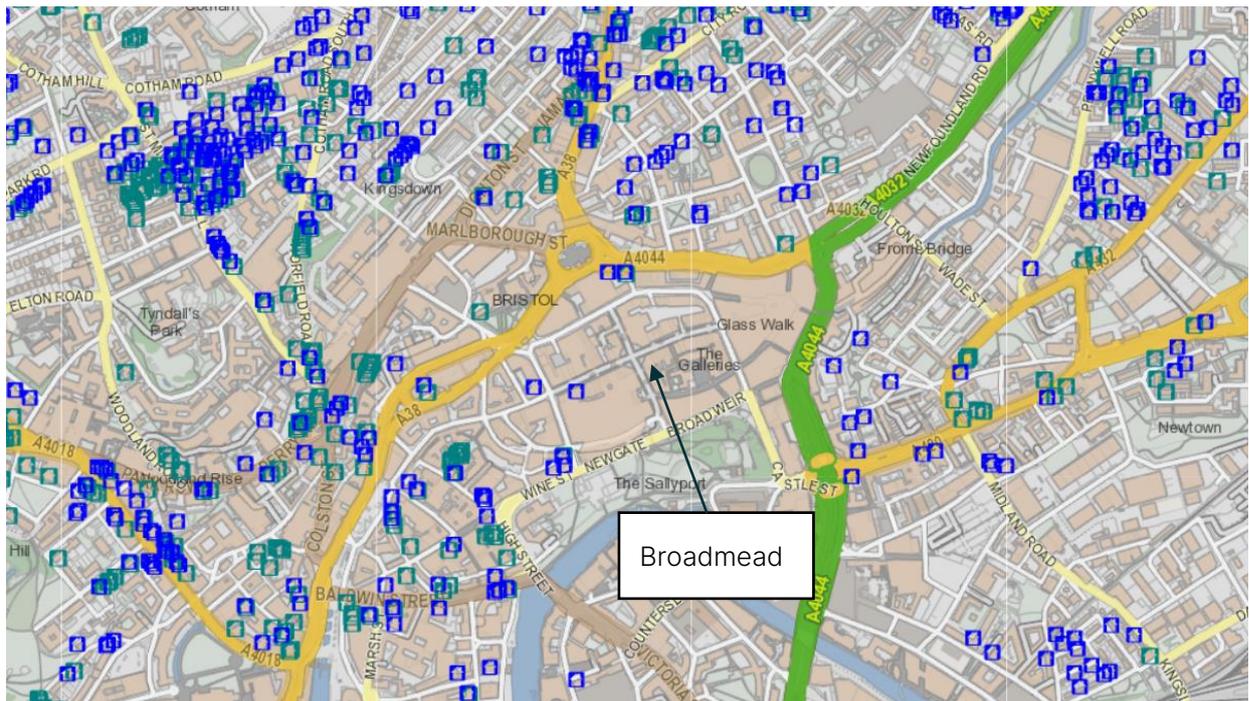


Figure 1: Extract from BCC Pinpoint website showing current licensed HMOs (blue & turquoise icons)

Policy DS2: Bristol Temple Quarter

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

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

- 1.23 Policy DS2 does not clarify the level of student accommodation expected and instead refers to Policy H7, which sets a 4,600 student bed space limit for the combined Bristol Temple Quarter and St. Philip's Marsh area. Since Policy DS2 concerns only the Bristol Temple Quarter Area (and not St Philip's Marsh, which is addressed in Policy DS3), it is not clear what portion of the 4,600 bed limit is applicable.
- 1.24 As set out elsewhere in this statement - and in the separate written statement concerning Matter 7 - the UoB does not consider the approach to providing / managing student accommodation in this area (and other areas of the city) to be sound nor positively prepared.

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Q4.12: Are the requirements set out in Policy DS2 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

c) Are the requirements set out under the remaining place principles (design, tall buildings, mix of housing, natural green space clear) 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?

- 1.25 The housing mix for the area includes student accommodation and reference is made to policy H7. As discussed elsewhere, the UoB has serious concerns about policy H7 and, in particular, the imposition of student bedspace limits.

Policy DS3: St Philip's Marsh

Q4.13: Is Policy DS3 justified, consistent with national policy and effective? In particular:

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?

- 1.26 No target is set for student accommodation in the St Phillip's Marsh area and, instead, reference is made to Policy H7. As commented in response to Q4.11, Policy H7 sets a 4,600 student bed space limit for the combined Bristol Temple Quarter and St. Philip's Marsh area, but it is not clear what portion of this applies to each area. The UoB also has wider concerns about the principle of using bedspace limits, the level at which they are set, and the evidence base upon which they – and wider student housing need - have been calculated.

f) Are the requirements set out under the remaining place principles (design, mix of housing, connectivity, green infrastructure, and pedestrian and cycle links) 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?

- 1.27 The UoB has concerns about the housing mix element and, in particular, the imposition of student bedspace caps as discussed above.

Policy DS4: Western Harbour

Q4.15: Is Policy DS4 justified, consistent with national policy and effective? In particular:

c) 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 delivery in this area?

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- 1.28 The UoB's comments remain unchanged from Reg 19 stage (January 2024). Clarity is sought on why support for student accommodation has been removed from an earlier draft of the policy (March 2019) and the UoB asks that this be reinstated.

Q4.16: Are the requirements set out in Policy DS4 justified, consistent with national policy and would they be effective in securing sustainable development? In particular:

d) Are the requirements set out under the remaining place principles (access) and housing mix and transport 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?

- 1.29 The UoB has concerns about the housing mix element and contends that student accommodation is an acceptable use for the area.

Policy DS5: Frome Gateway

Q4.17 c) Are the 500 bedspaces for student accommodation justified?

- 1.30 As discussed elsewhere, the UoB contends that the use of bedspace caps in principle – as well as the level at which they have been set - is unsound and unjustified.

Policy DS8 – Central Bedminster

Q4.23 g) Is the figure of 1,600 student bedspaces a requirement? If so, on what basis is this justified?

- 1.31 As discussed elsewhere, the UoB contends that the use of bedspace caps in principle – as well as the level at which they have been set - is unsound and unjustified.

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