



## 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 6: Infrastructure and Community Facilities**

**Issue 6.1: Whether policies IDC1 and SV1 relating to development contributions and social value are justified, consistent with national policy and effective.**

**Q6.2: Is it proportionate to expect all major proposals to be accompanied by a Social Value Strategy?**

Response - We do not support the inclusion of draft policy SV1, especially as currently drafted. Whilst the intentions behind the policy are understood, it is unclear as to how the criteria listed will be judged/measured and how the implementation of the social value strategy will be monitored. A case could perhaps be made for a Social Value Strategy to be provided in the context of what might be called 'super major applications', but it would in our view be disproportionate and indeed onerous for a SVS to be required of all major applications. We would again refer to on-going viability issues with the delivery of major housing schemes – the requirement to deliver a SVS would be yet another development cost, likely at the expense of the delivery of more affordable housing.

**Issue 6.2: Whether policies CF1 and CF2 relating to community facilities are justified, consistent with national policy and effective?**

**e) is the 10% requirement for affordable rent justified and is it sufficiently clear in what circumstances it would be required and on what basis the need for such facilities be assessed?**

**f) if the Council's proposed modification is to be adopted, the figure of 10% would be expressed as an aim. Is this modification necessary to make the plan sound, for it would be included in the reasoned justification, rather than policy?**

Response - The proposed CF1 requirement that major developments (where they would generate a need for new or extended community facilities) will be expected to provide a minimum of 10% of ground floor space suitably fitted out for the use of community and/or cultural organisations and groups and made available at an affordable rent strikes us as being overly prescriptive. In many instances it makes more sense for off-site contributions to be pooled toward new bespoke purpose built-facilities, or toward enhancement to existing community facilities. The requirement for each scheme to deliver space on-site does not seem logical in this respect and should include the flexibility to allow for off-site provision where it is considered to be most appropriate.



The suggested modification for the 10% figure to be expressed as an aim is more logical and would help to make the plan sound. A better modification would be as noted above – i.e. provision toward off-site facilities that could potentially be provided at a more meaningful scale.