



## **BRISTOL LOCAL PLAN EXAMINATION**

**Representations on Matters covered during weeks 4 - 7 of the Examination 7<sup>th</sup> March 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 7: Other Housing Policies**

**Issue 7.1: Whether policies relating to affordable housing positively prepared, justified, consistent with national policy and effective.**

#### **Policy AH1: Affordable housing provision**

**Q7.1: Is policy AH1 positively prepared, justified, consistent with national policy and effective? In particular:**

**b) Are the affordable housing requirements justified by proportionate and up-to-date evidence about need and viability?**

Response – We have not reviewed the Council’s evidence based in this respect in detail but we would urge careful consideration on this matter. Building costs continue to increase and the new fire safety regulations have added significant additional cost to most of the live projects that we are working on. Proposals at application stage that we are working on are now being supported by viability assessments which justify nil affordable housing.

**d). is the ‘threshold approach’ for proposals in the City Centre, and the 20% threshold itself, referred to in the second bullet point and paragraph 6.23, justified and is the policy clear and unambiguous as to how it would be implemented? If so, should the threshold be included in the policy to be effective?**

Response - Para 6.23 of the supporting text of this policy refers to the Threshold approach as currently set out in the Councils Affordable Housing Practice Note. At present this approach (i.e. 20% provision without a viability appraisal) also applies to selected areas outside the City Centre (i.e. Bristol Inner West and Inner East zones and within the Whitehouse Street Regeneration Framework). However, the main policy text and supporting text of Policy AH1 appears to indicate that the threshold approach will only apply to sites within the City Centre. Given comments above about overall viability concerns, this strikes me as a retrograde step that would act to inhibit the delivery of schemes in locations surrounding the city centre. In our view, the threshold approach should be set out formally within the main body of the Policy.

**Issue 7.2: Whether the remaining policies relating to housing delivery positively prepared, justified and consistent with national policy and would they be effective in securing sustainable development?**



## **Policy BTR1: Build to Rent Housing**

**Q7.7: Is Policy BTR1 positively prepared, justified, consistent with national policy and effective? In particular:**

**a) Are the thresholds and requirements, including tenure split, based on a robust assessment of viability and consistent with national policy and guidance?**

Response – In general we agree with the ambition to increase housing diversity and choice through support for build to rent homes. We note the requirement for BTR to provide 20% affordable housing and support that this is a lower percentage than the proposed policy requirement of 35% for general residential in draft policy AH1. It is welcomed that the policy includes wording to allow affordable housing percentages to be assessed where viability may be affected.

The primary desire to achieve a 75% social rent and 25% shared ownership tenure split of the 20% affordable housing sought is likely to be impractical in our view given overall viability constraints. Based on our experience, most developments will be doing well to achieve anything close to 20% affordable rent.