
Bristol Local Plan Examination

Matter 7: Other Housing Policies

Hearing Statement Prepared by Savills
on behalf of Bristol Alliance Limited Partnership

Introduction

1. Bristol Alliance Limited Partnership (BALP) submits this Statement in relation to Matter 7 of the Inspector's Draft Matters, Issues and Questions.
2. BALP has engaged with the draft Local Plan during the plan making process, including submitting representations to the Regulation 19 consultations, a copy of which can be found at the following link as respondent number 442: <https://www.bristol.gov.uk/files/documents/7679-240508-catalogue-of-representations-received-may-24/file>
3. As requested within IN4 Appendix 2, we have not repeated the concerns previous made but matters raised remain outstanding and these have been referred to where this is considered helpful. This response should therefore be read in conjunction with these Regulation 19 comments.

Issue 7.1 – Whether policies relating to affordable housing are 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:

c) Given the evidence, and reasoned justification, suggests 35% affordable housing would not be viable in all parts of the City, is it justified or consistent with national policy to expect this to be provided on all developments of 10 dwellings or more?

4. Draft Policy AH1 requires residential developments of 10 dwellings or more to provide at least 35% affordable housing. Paragraph 6.21 of the policy acknowledges that based on assessments of development viability undertaken in 2023 that it is not viable in all locations to deliver 35% affordable housing. A threshold approach is referred to in the policy for the City Centre. This recognises that there are viability challenges associated with sites within the City Centre, such that delivering 35% affordable housing will not always be viable. However, through the threshold approach, the developer's affordable housing offer should be at least 20% and the developer should agree to commence development within 18 months of any permission being granted and to meet all other relevant policy requirements. The inclusion of the option to submit a viability appraisal is supported by BALP as this acknowledges the varying factors that occur on a site by site basis which can impact on viability. As Bristol City Council themselves recognise the challenges of viability across the city it would not be viable to expect all developments to provide the prescribed level of affordable housing set out in the draft policy.

Policy H7: Managing the development of purpose-built student accommodation

Q7.5: Is Policy H7 justified, consistent with national policy and effective? In particular:

a) What overall need for purpose built-student accommodation has been identified and would the policy be effective in ensuring this is met?

5. Draft Policy H7 supports purpose-built student accommodation (PBSA) in the city however, it seeks to carefully manage its provision. The policy directs PBSA to defined areas of the city as detailed on diagram 6.2. This includes the provision of PBSA on University of Bristol residential sites, with up to 200 bed spaces at Clifton residential campus and up to 500 bed spaces at Stoke Bishop residential campus. Aside from the University of Bristol sites, PBSA is also directed to areas of growth and regeneration. In total the number of beds spaces permitted in such locations is 8,250 across the existing University of Bristol city centre precinct (800), Bristol Temple Quarter and St Philip's Marsh (4,600), Bristol Shopping Quarter (750), Frome Gateway (500) and Central Bedminster (1,600). The policy therefore prescribes the total number of bed spaces that will be permitted in each identified area.
6. The cap on student bed numbers in this policy is based on the assertion that the projected growth in student numbers will create a need for some 8,800 additional bed spaces city-wide by 2040. This projected figure is disputed and there are critical omissions in basing the need for student accommodation on this figure. The 8,800 bed space figure completely omits any need arising from the University of the West of England (UWE) students, who may also chose to live off campus in the city. In addition, the figure ignores the existing unmet need for PBSA in the city and instead focuses solely on projected numbers from only one of the two universities in Bristol. In 2023/24 there were 61,400 students across the two universities, with 31,100 at the University of Bristol and 30,300 at UWE. The projected increase in student numbers across the two universities is 27,000 over the plan period to 2040. This is significantly above the student bed cap prescribed in Policy H7 and, when taking into account the existing unmet demand for student accommodation, this policy would exacerbate the undersupply of PBSA in Bristol.
7. Furthermore, the need identified is based on the future projections of student numbers at the universities over the plan period. However, paragraph 6.77 forces a backward looking position on the provision of PBSA as it states that *'development counting towards the bed space limits for all defined areas set out in the policy includes all development completed, started, or with extant planning permission since March 2019'*. This means that in some cases the bed space limits in certain areas have already been met simply through development or permissions that have been granted within the last six years, although it is not clear what the significance of March 2019 is and why this has been chosen. It should be noted that consents do not always equate to delivery and provision, as not all schemes are delivered. Overall, this results in a plan that is not positively planning for the future needs of the city and in fact preventing any further growth in PBSA in certain areas, including those which are identified as suitable locations for PBSA. If adopted as worded, over the plan period, there are locations in the city where further student accommodation would be prevented from coming forwards even though there is an identified need for this use. The plan expresses the housing requirement as a minimum; the same approach should be taken to PBSA.

b) How does the provision of student accommodation contribute to the overall housing numbers and is this justified?

8. PBSA, whilst not conventional housing still contributes to the Council's housing land supply at a rate of 2.5 beds to 1 dwelling. Limiting the number of beds to be provided in PBSA restricts the contribution this type of housing can make to the Council's housing land supply, in an authority that cannot demonstrate a five year housing land supply. The restriction on the number of beds to be provided over the plan period should therefore be removed as PBSA can provide a positive benefit to the Council's housing land supply.

c) Is the principle of the numbers and defined locations/distribution as set out in the policy (for the University of Bristol sites, Bristol city centre, Bristol Temple Quarter and St Philip's Marsh, Broadmead, Frome Gateway and Central Bedminster) justified?

9. The principle of directing PBSA to certain locations which are better suited to accommodating PBSA due to their location and sustainability credentials is supported. However, the locations specified in the policy are those which relate to growth and regeneration, aside from the University of Bristol residential sites, meaning that large parts of the city centre which are suitable, sustainable and well located to provide PBSA are excluded.
10. Whilst the proposed locations for PBSA are generally supported, the student bed number caps for each area do not appear to be justified. It is unclear how the caps for each area have been arrived at and there is no justification for the distribution set out in the policy. Further evidence must be provided for the plan to be found sound. As mentioned the overall bed space cap is not supported and neither are the individual caps proposed for each area. The caps create an inflexible policy which is not capable of responding to market conditions and in any event do not currently reflect the existing and projected need for PBSA. The policy should be amended to remove the overall maximum cap number as well as the individual caps for identified locations.
11. As the proposed caps fall short of the current and future need for student housing and there is limited flexibility to deviate from these, this policy is likely to impact on the housing stock within Bristol. Without sufficient PBSA, students will turn to the private rented sector, putting greater reliance on HMOs and competing for houses which could be occupied by residents and families. This will result in a reduction in housing available for residents and worsen the existing unmet housing need, which is counter-productive to other policy aims. Overall, the principle of maximum cap numbers for student beds is not justified and does not result in a positively prepared plan. The policy should therefore be reworded to remove the maximum caps or refer to the figures as indicative/minimum requirements.

d) Will it be clear to the decision maker how to react to proposals when assessing them against the three bullet points in the first paragraph of the policy? How does this relate to the final paragraph of the policy relating to general provisions? Are the general provisions also capable of being assessed appropriately?

12. The first bullet point states that the amount and location of PBSA will be carefully managed to ensure that *'there are no adverse effects on existing communities'*. This is clear to the decision maker but is overly definitive, such that, taken literally, there should be no adverse effects at all arising from schemes. This doesn't appear to consider the scale of any impact or whether this could be suitably mitigated. Changing the wording so that it is more positively worded to ensure the policy is not absolute would help the decision maker to factor this into their decision making, when considering the planning balance.
13. The third bullet point seeks to ensure that the growth in student population is matched by the provision of purpose-built accommodation. As above, the policy caps are below the projected growth in student numbers and the definitive caps directly conflict with this bullet point. Again, the backward looking nature of the policy in terms of taking into account developments completed, started, or with extant planning permission since March 2019 further restricts the ability of schemes to come forwards that would meet the future student population growth. If a scheme does come forward that would help match the supply of student accommodation with growing demand, but in a location where the cap has already been exceeded it is

unclear how a decision maker should react to such a proposal. Removing the caps from the policy as suggested above would ensure that there are not conflicts within the policy itself.

14. In relation to the general provisions, it is necessary for all proposals for PBSA to demonstrate integration with surrounding communities and areas. It is unclear from the policy exactly how this would be demonstrated or assessed by decision makers so further clarity is required.

e) Are the suggested main modifications to Policy H7 in response to PQ86 regarding the support needed of the relevant higher education provider necessary for soundness? Is this part of the policy justified and will it be effective?

15. The main modification suggested is the clarification that larger scale developments are schemes which provide 250 bed spaces or more. The policy requires all proposals for PBSA to demonstrably meet identified needs and have the support of the relevant higher education provider when larger scale developments are proposed. There is no evidence to support differentiating between schemes above and below 250 beds. . Furthermore, where support is given by the policy for PBSA schemes in certain locations, within the cap, it is unclear why support would then also be needed from the higher education provider. This additional requirement could potentially prevent schemes which are policy compliant coming forwards and where such schemes would address the identified need for PBSA beds. This part of the policy is therefore not justified and could reduce the effectiveness of the policy in delivering PBSA schemes as such it should be removed.

i) The policy states that development in all locations will be expected to include an appropriate proportion of affordable student housing to meet identified need. Is this approach justified, based on viability evidence and will it be effective?

16. Affordable student housing is defined as a bed space within the development that is provided at a rental cost for the academic year equal to or below 50 per cent of the maximum income that a new full time-student living away from home could receive from the Government's Maintenance Loan (or any replacement state funding mechanism) for living costs for that academic year. This definition of PBSA is concerning given its connection to the Government's Maintenance Loan and there is no evidence submitted to support this approach, and this should therefore be reviewed and justified.

17. Previously there has been no requirement for affordable student housing to be provided within schemes. This requirement would need to be considered alongside CIL and any potential S106 contributions, which could affect the viability of schemes. Introducing a requirement for schemes to provide affordable student housing could ultimately deter schemes from coming forward, that would otherwise be policy compliant. This would further exacerbate the shortfall in housing in Bristol and not help to address the identified need for PBSA. The unintended consequences of this are that there will be an increased lack of PBSA when compared with demand which will increase existing rents for such accommodation. Students will also increasingly look to HMOs, reducing the supply of housing for residents and increasing rents for the remaining stock. The policy should therefore, like the draft affordable housing policy (AH1), recognise that due to viability challenges not all sites within Bristol City Centre will be able to meet the policy compliant level and therefore a threshold approach or option to submit a viability appraisal should be included.

18. Where schemes are already providing a mix of uses, as per the policy for PBSA in other locations, the additional requirement for affordable student housing could also affect the viability of these schemes. This

requirement would therefore not only prevent PBSA schemes coming forwards but it would also prevent other uses coming forwards as part of mixed use schemes.

19. Moreover, as referred to above, the affordable housing policy (AH1) recognises that there are parts of the city where delivering policy compliant levels of affordable housing would not be viable. This same approach should be taken for affordable student housing, should this requirement be taken forwards, to ensure that schemes can continue to come forwards that are viable.

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