

**Inspectors Louise Gibbons, Steven Lee,
and Benjamin Clarke**

c/o Robert Young (Programme Officer)

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Matter: 7

Representor:
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6th March 2025

Dear Inspectors,

Bristol Local Plan Review – Inspectors Matters, Issues and Questions

Matter 7 – Other Housing Policies - Representation prepared by Strutt & Parker on behalf of Structadene Group Ltd.

Structadene Group Ltd. ('Structadene') maintains an interest in the redevelopment of two sites in the north-west quadrant of St Philip's Marsh ('SPM'), one abutting Camwal Road and one abutting Feeder Road.

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?

Q7.2: Is Policy H4 justified, consistent with national policy and effective? In particular:

a) Is the policy clearly written and unambiguous about what type and mix of housing would be expected, or what information would be used to inform a decision?

1. No.

2. Structadene supports the principle and flexibility of the policy wording in facilitating a variety of accommodation types and mixes in the growth and regeneration areas. However, this policy must be applied pragmatically.
3. For example, seeking the delivery of larger homes, rather than denser, smaller dwellings in urban-centre locations, might not represent an efficient use of land, and will reduce the potential supply of much needed homes in Bristol. Also, larger family homes with gardens are not best placed in urban centre locations. This would represent an inefficient use of land.
4. Furthermore, the current draft policy wording seeks to give Local Plan status to the existing SPDs, stating that *“Within areas of growth and regeneration as set out in the Development Strategy an appropriate proportion of homes of various sizes will be sought **in accordance** with the provisions of those policies and any relevant supplementary planning documents, masterplans or spatial frameworks.”* (Our emphasis)
5. This is not appropriate. Whilst such frameworks/SPDs are helpful to coordinate development, it is the policies of the Local Plan itself that should be strategic, and evidence based. Policy wording cannot be determined by any such framework/SPDs and must instead form part of the Development Plan and pass the tests of soundness set out by the NPPF.
6. It is not appropriate, nor consistent with national policy for proposals needing to ‘accord’ with documents that do not form part of the Development Plan and have not been subject to independent examination. The frameworks/SPDs should have the status of a material consideration.
7. As such, it is suggested that to make the plan sound, the wording should be deleted or at the very least, made clear that the housing type and mix should only have to be informed by a framework/SPD, not strictly in accordance with.

b) Is the policy, or reasoned justification, clear about what “harmful imbalances” it is seeking to redress?

8. No.
9. The Policy is not sufficiently clear on what the ‘harmful imbalances’ are in specific areas. The Policy should set out clearly where “harmful imbalances” are, how this is assessed, and how applications would need to address this. This aspect of the Policy is therefore ineffective.

Q7.5: 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?

1. No.
2. The two largest higher education institutions with a presence in the city, the University of the West of England (UWE) and the University of Bristol (UoB), plan to increase student numbers over and beyond the plan period. However, the Local Plan evidence base underestimates growth forecasts and does not therefore positively plan to meet the needs for purpose-built student accommodation (‘PBSA’).
3. Policy H7 proposes a total of 8,950 bedspaces which aligns with the reference in Para 6.76 of the University of Bristol projecting demand for 8,800 bedspaces. However, this does not account for existing shortfalls in PBSA or growth from other higher education institutions, including UWE.
4. There is no evidence behind the cap on student housing provision and it should be removed to ensure the plan is positively prepared and effective in meeting the need for PBSA. Alternatively, a higher minimum target for student bedspaces should be set to ensure the need is effectively met.

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

5. There is concern that the provision of PBSA outlined in the draft Local Plan will not be sufficient to address the current shortfall in bedspace provision together with the future demand for student accommodation aligned to the growth aspirations of both higher education institutes. The draft Policy is therefore not positively prepared as it does not meet the area need for PBSA.
6. Draft Policy H7 should be amended to remove the maximum limits on student bedspaces or refer to the figures as minimum requirements.
7. The under-delivery of student housing has major housing market consequences, particularly on the private rented housing market where the high student demand reduces the available stock of houses and flats that would otherwise be available to meet the needs of local people and drives up rents way beyond what many people can afford.

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?

8. Structadene support that St Philip's Marsh is identified as one of the areas of growth and regeneration where student accommodation is to be supported in principle (under Policy DS3). However, Structadene does not support including a limit on PBSA. This creates an inflexible policy which could prevent PBSA development which would be attracted to this highly sustainable, central location, close to university premises. This is in direct conflict with the objectives of the NPPF which supports a presumption in favour of sustainable development and seeks to significantly boost the supply of housing. As set out above, under-delivery of student housing has a major impact on the

private rented sector which reduces the available stock of homes that would otherwise be available to meet the needs of local people.

9. Draft Policy H7 should be amended to remove the maximum limits on student bedspaces across the different areas or, alternatively, refer to the figures as minimum requirements.

10. As set out in our Regulation 19 representations, Structadene own two sites near the north-western gateway of St Philip's Marsh which are eminently suitable for at least an element of student housing which could help to address this unmet need. The sites are located close to other student accommodation in the adjacent Temple Quarter and benefit from excellent public transport facilities. Student housing would also marry well with the Council's current plans for the area – to create a knowledge and innovation quarter.

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?

11. No.

12. The first bullet states *“The amount and location of purpose-built student accommodation will be carefully managed to ensure that:*

- *There are no adverse effects on existing communities;*

13. The term *‘no adverse impacts’* is an absolute. Taken literally, it would mean that any adverse effect, no matter what scale or materiality would result in policy conflict with H7. This is not in accordance with national policy and completely neglects the provision which stipulates that planning conditions and obligations can be used to make otherwise unacceptable development acceptable.

14. As such, the first bullet point under Policy H7 should be deleted.

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. No.

16. By requiring larger scale development (250 bed spaces or more) to have the support of higher education providers where accommodation is being provided for students of that institution will limit the overall delivery of PBSA.

17. There is no clarity about the necessity of this aspect of policy. The policy mentions Nomination Agreements; however, it is not clear whether the higher education providers have the desire or ability to enter into such commercial commitments to all PBSA schemes that would be needed to meet clear need. The consequences being that applications would not be permitted if this commercial contract is not secured. On this basis this aspect of policy is not considered to be sound.

18. A range of PBSA options in varying locations will provide choice to students and thus reduce the quantum of students in the private rental sector, freeing up homes for rent and relieving pressure on the city's housing stock.

f) Are the suggested main modifications to Policy H7 in response to PQ88 regarding the support of local communities necessary for soundness? Is this part of the policy justified and will it be effective?

19. Nothing to add beyond comments made elsewhere in our representations.

g) The part of the policy referring to 'Other locations' indicates that proposals for purpose-built accommodation should form part of mixed-use locations. When considered with the other bullet points in this part of the policy, will be it be effective?

20. Nothing to add beyond comments made elsewhere in our representations.

h) Paragraph 6.87 sets out the circumstances in which a local imbalance is likely to occur. To be effective, should these circumstances be set out in the policy and is the approach justified?

21. No.

22. Supporting text at Paragraph 6.87 to Policy H7 sets out the imbalance thresholds.

23. The thresholds are not practical, clear or justified and will result in more planning applications being refused thereby impacting supply further. For example, how are the distances and bedspace quantum justified? These thresholds do not appear to be informed by any apparent evidence.

24. These thresholds, along with the caps on PBSA are likely to restrict the supply of PBSA in the city and worse-over, in highly sustainable locations, particularly in areas in close proximity to higher education facilities and services. This could in turn lead to a significant shortfall of PBSA which has to be made up through windfall sites elsewhere, in locations less sustainable and less suited to student accommodation.

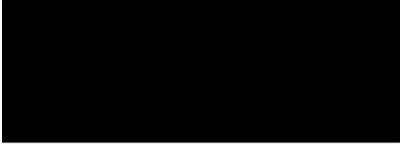
i) The policy states that development in all locations will be expected to include an appropriate proportion of affordable student housing to meet identified need. Is this approach justified, based on viability evidence and will it be effective?

25. Nothing to add beyond comments made elsewhere in our representations.

WORD COUNT – 1,786



Yours sincerely,



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