

REF: R00118/MR

VIA EMAIL ONLY: Robert.Young@Bristol.gov.uk

7 March 2025

Dear Mr Young,

**EXAMINATION OF THE BRISTOL LOCAL PLAN 2022-2040
HEARING STATEMENT: MATTER 7
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of our client, Unite Group Plc (Unite), to submit a Hearing Statement in response to the Matters, Issues and Questions (MIQ's) raised by the Inspector concerning the Examination of the Bristol Local Plan 2022 – 2040 (draft BLP). The submission of this Statement follows representations made on behalf of Unite to both various stages of the draft BLP's preparation, as well as other supporting planning policy documents in Bristol, as follows:

- Representations to the Bristol Local Plan Review made in February 2018, and again in March 2019;
- Representations to the draft Bristol Supplementary Planning Document: Purpose-Built Student Accommodation and Shared Living Development in January 2022;
- Representations to the Bristol City Centre Development and Delivery Plan Consultation in September 2023;
- Representations to the Bristol Temple Quarter Development Framework Consultation in March 2023; and
- Representations to the Bristol Local Plan Publication Version in January 2024.

Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes to 70,000 students across 177 properties in 23 leading university towns and cities. This includes numerous existing properties in Bristol including Orchard Heights, Phoenix Court, Marketgate and Brunel House, more recently completed schemes such as Campbell House (the former Bristol Royal Infirmary hosting 431 student bedspaces), and further schemes under construction and due for opening in 2025-2026 such as Avon Point (636 student bedspaces) and Freestone Island (500 student bedspaces).

Following on from the representations submitted on behalf of Unite to the draft BLP Publication Version at Regulation 19 Stage, dated 26th January 2024 and hereafter referred to as 'Reg. 19 reps', this Statement focuses on Matter 7: Other Housing Policies.

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?

Q7.5: 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?

It is first necessary to repeat the concerns provided in Unite's reg 19. Reps that the overall need for PBSA is significantly underestimated by the Council. There are two main issues here:

1. As set out clearly in previous representations submitted by others, the projected need does not account for the projected growth of the University of the West of England ((UWE) Bristol; and
2. As set out clearly in Unite's reg. 19 Reps, and in representations made by others, the projected need does not take account of the existing shortfall of PBSA within the city.

Taking point one first, the Joint Impact Statement submitted by the University's to previous consultation stages sets out that UWE is targeting student growth at 5% a year, from 33,000 in 2022/23 to 42,000 by 2029/30. In response to the Inspector's identification of this issue at PQ84 of IN2, the Council's answer is that "*any need for additional bed spaces in Bristol generated by UWE's intended growth is unlikely to be significant and can be accommodated through the current policy approach*". An addition circa 9,000 students over 5 years is not an insignificant number. Simply planning for only part of the anticipated growth in student numbers is entirely unjustified.

Turning to point two, the Council's disregard for the existing shortfall in student accommodation is best evidenced by their response to PQ85 in EXA024, which reads:

"The council is aware that the needs of the existing student population have been met to date through a variety of existing accommodation types including university owned halls of residence and houses, PBSA and other forms of small-scale private accommodation including shared houses/flats. On this basis the policy has not considered the issue of supposed existing under-supply of PBSA given that all existing students are understood to have some form of accommodation".

The Council's own Housing Needs Assessment (HNA) which forms part of the evidence base contradicts this. The HNA identifies that there are around 59,400 students currently studying at institutions in Bristol and that there was a total of 16,500 bedspaces provided in 2023. This equates to a figure of 3.6 students per bedspace. That means that 42,900 students were housed outside of PBSA, including in shared housing. The HNA then continues to identify that university growth plans will result in this number increasing to approximately 65,900 students by 2030, and that in the event that all currently planned

PBSA bedspaces came forward, this would result in a 49% increase in PBSA accommodation. Whilst that may be the case, a provision of 24,650 bedspaces against a projected population of 65,900 students still only equates to a figure of 2.7 students per bedspace. Notwithstanding the impact that this quantum of students residing in conventional housing has on the availability of housing for other groups, this is quite clearly representative of an existing shortfall in the supply of PBSA.

The Council's identification of overall student housing need is thus entirely unjustified. The NPPF requires that the needs of specific groups are addressed. The policy must plan to meet the needs of students, and this includes addressing both the existing shortfall and the projected growth in student numbers. The following changes are recommended:

- Paragraph 6.71 of the supporting text must be amended to read that 'student need should be met...' (as opposed to 'growth in student numbers should be met...');
- The first paragraph and its associated bullet points should be deleted (this is addressed further in response to part 'd' below);
- All reference to a 'cap' on bedspaces should be struck out (as addressed further under part 'c' below);
- Paragraphs 6.76 and 6.77 must be re-worded in line with 6.71 as suggested above.

As drafted, the policy would be entirely ineffective in meeting the needs of students in the city.

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

PBSA is a form of housing. It contributes towards overall housing supply at a ratio of 2.4 bedspaces being equivalent to one dwelling. This is a well-established principle and the references to national guidance where this is detailed (as contained within Unite's Reg. 19 Repts) are not repeated here. This is the only sound means of interpreting PBSA's contribution towards overall housing numbers as it is the only means that would be consistent with national policy.

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?

The principle of imposing 'caps' on the delivery of PBSA is entirely unjustified. It is understood to be common ground that Bristol has an acute housing crisis. The 'caps' will prevent the delivery of sufficient student housing to meet the needs of the student population (which as detailed earlier in this Statement, have been severely underestimated) and will serve to worsen this crisis. It is entirely unclear why 'caps' are imposed on PBSA, but on no other form of development.

Indeed, the planning officer's report associated with a scheme proposing PBSA within the St Philip's Marsh Area, that was granted planning permission, means that (by the Council's figures), 4,208 bedspaces have been consented against a proposed cap of 4,600. This must mean that the Council consider it sound to deliver only 392 more student bedspaces directly adjacent to a new university campus, with plans for further growth, over the entire plan period (to 2040).

In 2022, the University of Bristol estimated the number of students living in HMO's to be approximately 55%, which is already far higher than the national average of 30%. This figure will only increase, resulting in the further loss of conventional family housing in favour of uncontrolled HMO's, if sufficient PBSA development is not delivered. This will have a net negative impact on housing supply as a whole, which is directly contradictory to the policy intention, unjustified, and inconsistent with national policy.

Moreover, it is understood that the 'caps' are partly imposed due to a perception that PBSA harms existing communities or must be balanced against other types of housing.

Unite object to the principle that PBSA has detrimental effects on residential amenity and/or the character of an area. There is no tangible evidence to suggest that concentrations of PBSA causes harm to the balance, function, diversity or character of an area, nor an adverse impact on residential amenity. The assumption that concentrations of university students are liable to give rise to residential amenity issues and be detrimental to the cohesiveness of communities is discriminatory and a distorted generalisation of a single category of people. Considerations of harm to residential communities conflates the delivery of PBSA development with uncontrolled HMO accommodation, which is a markedly separate housing product and is entirely unjustified (and not least will be exacerbated, as set out above, should sufficient PBSA not be delivered).

Lastly, is it not possible to prevent students from living in a certain area. Students want to live close to universities, in areas that are highly accessible. This applies to all of the areas contained within the policy where a 'cap' is proposed to be applied. The policy would only prevent students from living within PBSA in those areas, as there would not be a sufficient quantum available. As can be seen from precedent examples where a similar approach has been taken (as detailed within Unite's Reg 19 Repls), students continue to live in these areas, just not in PBSA. A report to Manchester City Council's Economic Scrutiny Committee in November 2019 identified that planning policy at the time, which sought to manage the overall delivery of PBSA within the City Centre, had not keep pace with student demand. In turn, Manchester City Council identified a loss of £17 million in potential Council tax revenue as a result of students living within the private rental sector. Of particular relevance, in two examples of newly developed conventional residential housing within the City Centre, over 50% of the units were exempt from Council tax.

The proposed 'caps' will prevent the delivery of sufficient PBSA to meet the needs of students in the city, and are based upon an entirely unjustified identification of need compounded by an unjustified

perception that students harm communities. It is a well-established principle that PBSA is a form of housing that contributes towards housing supply. Unite consider it unjustified and inconsistent with national planning policy to take the alternate stance that PBSA can have negative impacts upon housing balance and choice.

All reference to student or bedspace 'caps', both within the policy text and within the supporting text, must be struck out. The policy is unsound whilst any reference to bedspace 'caps' are made, being unjustified, contrary to national policy, and serious preventing the effective delivery of sufficient housing to meet student needed.

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?

The first three bullet points read as a statement of the intent of the policy rather than as a policy expectation or requirement. They should be re-located to the supporting text.

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?

No comment.

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?

No comment.

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?

No specific comments albeit this element of the policy is considered unsound for the same reasons explored elsewhere in this statement (the delivery of PBSA should be encouraged, not hindered).

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?

There is no tangible evidence to suggest that concentrations of PBSA causes harm to the balance, function, diversity or character of an area, nor an adverse impact on residential amenity. The assumption that concentrations of university students are liable to give rise to residential amenity issues and be detrimental to the cohesiveness of communities is discriminatory and a distorted generalisation of a single category of people.

Moreover, there is no tangible evidence provided to explain how the Council have arrived at the quantum and radius given. Unite emphasis that arbitrary standards such as these do not serve to prevent students from residing in certain areas. It simply prevents students from residing within PBSA in these areas, directing them instead to conventional housing supply.

The contents of paragraph 6.87 must be deleted in its entirety for soundness, along with the corresponding policy wording.

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?

Unite consider that this element of the policy is neither justified nor effective. Notwithstanding the shortcomings with the presented viability evidence identified in representations made by others, at the very least, the market is in a markedly different place since this was prepared. It is concerning that the policy does not seem to provide for a reduction in any affordable provision on a viability basis at application stage.

And irrespective of the above concerns, Unite's position is that a blanket requirement is not an effective means of improving affordability. The best way to increase affordability is to increase supply. Various elements of policy H7, including the proposal for a blanket affordable requirement, would do the opposite of encouraging further PBSA supply. In fact, the policy will do the opposite, constricting supply and simply driving up the cost of PBSA in the city.

The affordable student housing section within the policy should be struck out. It is not justified and will seriously impact the effective delivery of sufficient housing to meet student needs.

Unite reserve the right to further their comments via participation in the hearing sessions as part of the Examination in Public.

I trust this Statement is in order and look forward to confirmation of safe receipt. Please do not hesitate to contact myself should you have any queries.

Yours faithfully,



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