

BRISTOL LOCAL PLAN EXAMINATION**STATEMENT ON MATTER 7: OTHER HOUSING POLICIES****Introduction**

- 1.1 This Statement has been prepared by Rapleys on behalf of the University of Bristol (UoB). It concerns Matter 7 (Other Housing Policies) of the Bristol Local Plan Examination, as set out in *IN4 - Appendix 1: Bristol Local Plan – Draft Matters, Issues and Questions (MIQs)* issued by the Inspectors in December 2024. It should be read in conjunction with the Matter 7 Statement and appendix by Cushman & Wakefield (C&W) and the accompanying reports by Oxford Economics.¹

Questions and UoB Responses

- 1.2 Relevant Matter 7 questions are addressed in turn below.

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?

- 1.3 The identified need figure of 8,800 bedspaces is unsound. It is based solely on the UoB's prediction that an additional 8,834 beds will be required to serve their students by 2040 (rounded to 8,800). Importantly, it fails to account for:

- The historic and existing unmet need for PBSA in the city.
- The demand for PBSA beds arising from the predicted growth in student numbers at University of the West of England (UWE) and other Higher Education providers over the plan period.

Historic and Existing Unmet Need

- 1.4 C&W calculate existing unmet need as the number of bedspaces immediately required to bring Bristol's student-to-bed ratio (2.85:1) level with:

- The national average of 2.12:1 - 6,031 bedspaces required.
- The major market average of 2.07:1 - 6,602 bedspaces required.

- 1.5 With this in mind, the Council's need figure of 8,800 beds is only just sufficient to address the current undersupply, let alone to satisfy future demand.

- 1.6 The Council's response to PQ85 is worth considering at this juncture, which states:

¹ The economic impact of the University of Bristol (December 2024) & The social impact of the University of Bristol (December 2024)

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The policy approach is focused on the provision of sufficient PBSA to meet future student growth (Policy H7 first paragraph, third bullet and paragraph 6.71). 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. Consequently, the policy approach does not calculate a figure relating to any supposed shortfall in PBSA or include such a figure in the overall calculation of need.²

- 1.7 Neither the Topic Paper (April 2024), nor the Council's response provide any quantitative evidence to justify this position.
- 1.8 Simply because students "have some form of accommodation" does not mean they aren't in the market for a PBSA bedspace. Where need is unmet, there are likely to be students lodging with friends, sleeping on sofas, or in poor quality accommodation, including unlicensed HMOs.
- 1.9 Here it is worth considering the options facing students who want, but are unable to access, PBSA in the same town as their university. They will either:
- Reject the university and select another institution where suitable PBSA can be found. This would have a direct impact on the prosperity of the university and local / regional economy.
 - Accept "second choice" PBSA in a more remote location and commute unnecessarily long distances. This is unsustainable by comparison.
 - Stay with parents and commute longer distances to study.
 - Rent traditional housing instead (often family housing), thereby reducing supply in the wider housing market and putting pressure on market rents.
 - As above, lodge with friends or take up another form of suboptimal (and potentially inappropriate) accommodation.
- 1.10 There is also other evidence of existing unmet need, including:
- **High rental costs for students.** Of note, the weighted average annual rent in Bristol in 2024/25 (£10,765.57 per year) is the highest in the UK and is 29.03% higher than the national average (£8,343.39). The average private sector direct-let bed price in Bristol (£17,991.08 per year) is also the highest in the UK (outside London) and is now 88.20% higher than the national direct-let average price of £9,559.32.

² BCC response to IN2 Preliminary Questions (October 2024)

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- **Large numbers of students unable to access PBSA.** Bristol has the highest percentage of students with a requirement for a bed unable to access one in PBSA of any major market in the UK, at 65.62% of all students.
- **Large numbers of first year students unable to access PBSA.** In 2022/23, 3,128 first year students would have been unable to access a PBSA bed, even if every PBSA bed had been taken up by a first year student. For many first year students, university represents the first time living away from the family home. Therefore, “pastoral care” and the managed nature of PBSA is important in promoting good social and learning outcomes.
- **More students occupying general housing stock.** Between 2013/14 and 2022/23, the number of students with a requirement for a bed but unable to access one in PBSA has grown from 19,699 to 32,518, an increase of 12,819 students, or 65.07%. At four students per House in Multiple Occupation (HMO), this is an increase of 3,205 houses occupied by students. High student rents are often an incentive for private landlords to “flip” family homes into student HMOs.
- **High student-to-bed ratio relative to other markets.** Bristol’s student-to-bed ratio of 2.85:1 (2022/23) is the highest of any major UK market outside of London, and is far higher than both C&W’s nationally observed average ratio of 2.12:1 and the average ratio across comparable major UK markets of 2.07:1.

1.11 The above is set against the backdrop of a wider housing crisis in Bristol and the emerging plan’s failure to meet Objectively Assessed Need calculated using the standard method.

Expansion at UWE

1.12 The Council has confirmed that UWE’s student growth predictions set out in the Joint Impact Statement are correct (48,000 students by 2039/40). As mentioned above, it has also confirmed that this expansion has not been taken into account in the student housing need calculation. The Council justifies its position by stating that “recent informal discussions” with UWE indicate such growth will not result in a significant increase in demand for student bedspaces in Bristol.³ No robust evidence is provided to support this presumption.

1.13 As such, the Council’s decision to derive student housing need solely from UoB’s predicted growth – and to discount the potential demand from anticipated growth in UWE student numbers without suitable evidence – is unreliable and unsound. It is also contrary to the stated strategic objective of meeting need in full.

Mismatched Base Dates

1.14 As explained in the PBSA Topic Paper at [2.8] and Appendix A, the Council’s calculation of student housing need has a base date of 2023. However, paragraph 6.77 of the explanatory text to Policy H7

³ BCC response to IN2 Preliminary Questions

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states that calculation of bedspaces which contribute to the caps in Policy H7 will include *“all development completed, started, or with extant planning permission since March 2019.”* This means that the supply and need periods are not aligned. As such, PBSA development (completed, started or with permission granted) between March 2019 and 2023 will eat into the caps without counting towards the identified need. Accordingly, Policy H7 is not providing a sufficient supply of spaces to even meet the need calculated by the Council (leaving aside the deficiencies in that calculation, already explained). This results in an unsound and unreliable policy.

Consequences for Soundness

1.15 The problems arising from the unreliable calculation of student housing need are compounded by the imposition of bedspace limits in policy H7 (instead of minimum targets). This approach is unsound because:

- **It fails to accord with the NPPF**, which seeks to significantly boost housing supply and promotes minimum targets. In particular, paragraph 61 of the NPPF refers to the *“minimum number of homes needed”* and paragraph 62 states that *“housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”*
- **The bedspace limits are set too low.** As above, this is because the Council’s calculation of student housing need fails to account for the current undersupply of PBSA and the demand arising from the predicted growth in UWE student numbers.
- **It would create internal conflict within policy H7**, given the stated objective to ensure the *“growth in student population is matched by the provision of purpose-built accommodation.”*⁴ For example, if the bedspace limits were to be met at some point in the (not-so-distant) future, yet the student population continued to grow, the policy restrictions would act against the policy objectives.
- **Bedspace limits are inflexible** – by their very nature – and thus incapable of reacting to changes in the PBSA market, the wider housing market, the expansion plans of Higher Education facilities, or any other forces that might affect supply and demand of PBSA.

1.16 Policy H7 allows for bedspace caps to be exceeded in growth and regeneration areas *“where development is directly supported through area specific guidance or, where no guidance is published, meets the criteria set out below for other locations.”*

1.17 The “other locations” section of the policy introduces tests and requirements over and above those set out for the defined areas, including:

⁴ Policy H7, first paragraph, bullet point 3

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- A requirement that PBSA should form part of mixed-use developments comprising an element of other compatible residential use where feasible.
- A local imbalance threshold test at 1000 bedspaces within 200m of a site.
- A requirement that self-contained accommodation provides a contribution towards general affordable housing in line with policy AH1.

1.18 These additional criteria – imposed once the bedspace caps are exhausted - will no doubt affect scheme viability, the likely result being a “rush” to secure permission before bedspace allocations are filled. The following questions are then raised about how the policy will work:

- What happens if an application uses up the remaining capacity of an area and “spills over?” Would the entire development be assessed against the “other location” criteria, or just the overspill element?
- How will developers know when the bedspace limits for each area have been exhausted? As above, this will have a material impact on the scheme requirements and viability.

1.19 Since the total capacity of the bedspace caps (8,950) is based on an underestimate of student housing need, it will be necessary to rely on additional PBSA delivered via the “other locations” route if the true need is to be met. As above, the “other locations” policy tests are more onerous and unrealistic, and, as a result, the supply of PBSA will be restricted / reduced.

1.20 Therefore, it is unlikely that:

- The true level of need can be met through this complex and potentially restrictive route.
- There is capacity in the city to meet the true level of need for PBSA. Since the need figure has been underestimated, this assessment has not been undertaken, and it is not clear how many bedspaces can be delivered through the “other locations” criteria (particularly the local imbalance thresholds).

1.21 The NPPF (September 2023) states that plans should be prepared positively - in a way that is aspirational but deliverable⁵, and should contain policies that are clearly written and unambiguous⁶. For the reasons discussed above, policy H7 is considered to fail both requirements.

1.22 The PBSA Topic Paper (April 2024) confirms that bedspace limits were calculated by multiplying the average density of student accommodation across the city centre (33.7 bsph) by the area of the relevant UoB site or area of growth and regeneration.

1.23 It is illogical to apply a city centre density multiplier to a university campus, the former being mixed use and the latter providing student accommodation and associated facilities only. If there is to be a limit

⁵ NPPF Paragraph 16(b)

⁶ NPPF Paragraph 16(d)

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on PBSA beds at a campus location, this should be a product of design constraints, rather than land use considerations.

- 1.24 It is also noted that the bedspace figures for the UoB sites are expressed as outright limits, with no scope for exceedance (unlike in the areas for growth and regeneration). This approach is unsound.
- 1.25 Again, it is illogical to set PBSA caps in the areas of growth and regeneration based on the current city centre average density, since these areas are identified as *locations for more intensive forms of development* under policy UL1.
- 1.26 Overall, the UoB contends that the identified need for PBSA is a significant underestimate and, that by virtue of inflexible bedspace caps, local imbalance thresholds, and other complex and restrictive elements, policy H7 will not be effective in ensuring the actual level of student housing need is met over the plan period, nor would it comply with the requirements of the NPPF.
- 1.27 If this is the case - and the supply of PBSA is unnecessarily constrained - the outcome for the UoB, the city of Bristol and the wider region will be a wholly negative one. In this respect, the UoB is concerned that the emerging Plan will:
- Fail to address the existing PBSA shortage
 - Constrain the supply of PBSA units
 - Further raise PBSA rents (which are already extremely high) through supply and demand principles
 - Undermine the attractiveness of Bristol as a destination for students
 - Undermine the competitiveness of the UoB relative to other Russell Group Universities.
 - Unnecessarily restrict the growth potential of the UoB
 - Reduce the economic and social benefits the UoB could otherwise deliver, were a more supportive policy adopted.
 - Exacerbate inequality in access to higher education
 - Coerce student housing to fringe areas of the city, which would result in a less sustainable, more travel & carbon intensive, pattern of living, which could also be more disruptive to traditionally residential areas.
- 1.28 Taking into account the significant economic and social benefits derived from the UoB and its students⁷, as well as the potential for further benefits associated with its expansion plans, the UoB is concerned that the Plan could harm the attractiveness of Bristol as a destination and constrain its potential growth and prosperity.

⁷ Please see the UoB's representations on Matter 4 and the accompanying reports by Oxford Economics for further details.

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

1.29 Student accommodation is a subset of housing in general. The Council's failure to properly calculate student housing need and support the delivery of PBSA will, therefore, undermine the wider housing requirement figures and the delivery of sufficient housing across the plan period (which is already expected to fall short of Objectively Assessed Need under the standard method).

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?

1.30 As above, the UoB objects to the use of bedspace limits for the UoB sites and areas of growth and regeneration.

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?

1.31 Certain bullet points from the first paragraph are addressed below:

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

1.32 To prevent misunderstanding, it is recommended that the wording be altered to read "... no significant adverse effects ..." and clarity provided on which effects the Council will look to assess.

- *Growth in student population is matched by the provision of purpose-built accommodation.*

1.33 This point has been discussed above. At face value, the UoB wholeheartedly supports this objective. However, the Council's failure to accurately calculate student housing need, alongside the introduction of inflexible bedspace caps, could cause the restrictive elements of the policy to work against the objective. These overly restrictive elements should be amended to ensure the policy as a whole pulls in the same direction.

1.34 Certain general provisions are addressed below:

- *Demonstrate integration with surrounding communities and areas;*

1.35 This criterion is vague. How should an applicant go about demonstrating integration?

- *Make provision for disabled access and disabled parking for occupants and visitors;*

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- 1.36 No objection in principle, though a pragmatic approach should be taken where a development involves reusing existing buildings – particularly listed buildings – since adaptation for disabled access and provision of disabled parking may not always be feasible.
- 1.37 In addition, there are other elements of the policy that are unclear and overly complex. As discussed earlier in this statement, the use of bedspace caps in areas of growth and regeneration, and the need for developers and decision makers to “transfer” to a different section of policy (“other locations”) once they are exceeded, is an overly complex and unnecessary construction.
- 1.38 It is also unclear whether self-contained student studios would be “double counted” towards both affordable student housing and general-purpose affordable housing. The UoB’s comments in chapter 6 of the Reg 19 representations are relevant here.
- 1.39 There is further confusion concerning:
- The application of affordable student housing policy (discussed below).
 - Local imbalance thresholds (discussed below).
 - The requirement for UoB to produce masterplans (see Reg 19 representations).
 - Why the Stoke Bishop bedspace cap has been reduced (see Reg 19 representations).
 - What a “compatible” residential use might include (see Reg 19 representations).
- 1.40 Taking the above into account, Policy H7 is considered to be overly complicated and unclear, and therefore fails to comply with paragraph 16 of the NPPF (September 2023).

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?

- 1.41 The UoB recommends that “for example” be replaced with “including but not limited to” to provide greater clarity.

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 it be effective?

- 1.42 The UoB objects as set out at Reg 19 stage. Mixed use development should be promoted, not required.

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?

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- 1.43 The UoB previously objected to the threshold approach, citing a lack of evidence, stress testing and justification. The Council has since produced a PBSA Topic Paper (April 2024) explaining how the thresholds were calculated. The UoB supports the Council's aim to promote mixed and balanced communities, but questions whether local imbalance thresholds are best tool to achieve this.
- 1.44 The Topic Paper explains that the "much higher than average" level of deviation was used to calculate the thresholds, but no robust evidence is provided demonstrating that harm arises after that threshold is breached. The UoB has previously objected to the assumption that a high concentration of students equates to social harm, particularly when residing in managed PBSA development (which the policy requires).
- 1.45 The justification for selecting a 200m radius is not convincing, nor is the implication that PBSA will impact a greater geographical area than HMO development (100m radius), when the former is subject to management regimes and the latter often unmanaged.
- 1.46 Taking the above into account, the UoB is concerned that the threshold approach is lacking robust evidence and justification.

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?

- 1.47 The UoB's Reg 19 comments on affordable student housing remain relevant. In short, the UoB supports the principle of affordability, but rather than a blanket requirement for affordable units, contends that the most effective means to promote affordability is to increase supply of PBSA. The UoB is also concerned about the role it is expected to play in allocating and managing affordable student units, which would see it effectively controlling the market i.e. by nominating all developments and effectively acting as an oligopoly.
- 1.48 The UoB notes that neither of the PBSA scenarios assessed in the Local Plan Viability Assessment (August 2023) – a 325 studio scheme and development of 200 x 4 bed clusters – would meet their design expectations (the same design expectations mentioned in the Council's response to IN2). Given that under Policy H7 such developments would require the support of a Higher Education provider (often UoB), the decision to test schemes that fail to comply with their expectations is illogical.

Word count = 2,945 words (excluding introductory paragraph, question wording and quoted policy).