



Science Creates

Bristol Local Plan Examination - Matter 8:
Economy and Inclusive Growth
Representations on behalf of Science Creates



ScienceCreates

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1. Introduction

This document is prepared by The Urbanists, and Science Creates. It provides Science Create's representations into Bristol City Council's Local Plan Examination, which is currently in session. Specifically, it relates to the following:

- Matter 8: Economy and Inclusive Growth, Issue 8.1: Whether policies E1 – E8 are justified, effective and consistent with national policy.

Science Creates is a deeptech ecosystem operating in central Bristol, home to a range of companies in the biotech and life sciences sector. It was set up by the founders of another start-up, Ziylo, after recognising that there was no home for science companies in the centre of the city.

This document provides the following:

- A brief introduction to Science Creates as a business, the sector we work in, the impact we are having on the City of Bristol, and the challenges we face as a developer.
- Our representations into Matter 8, Issue 8.1 with this in mind.

- Some concluding thoughts based on the above.

2. Who We Are And The Challenges We Face

2.1 Our Business Model and Impacts

Founded in 2015, Science Creates offers a combination of space, advice and investment into early-stage and scale-up deep tech companies. This enables scientists and engineers to establish new start-ups, accommodating spin-out companies from West of England universities and beyond.

Science Creates currently comprises two research facilities in Bristol. The business aims to deliver a third incubator facility, through re-purposing a 30,000sqm ft industrial building close to Old Market and the Temple Quarter Enterprise Zone. Science Creates is estimated to generate £125m per annum in Gross Value Added (GVA) to the wider economy, demonstrating how businesses of this nature offer a significant value to the city of Bristol.

More information on Science Create's work is provided in our original representations (refer to Sections 2-3)

2.2 The Challenges and Opportunities We Face

Bristol has a shortage of industrial space, with demand significantly outstripping supply, particularly in the city centre where there have been no new developments since 2000 (source: Bristol Employment Land Review 2023). This means there is strong competition for any new sites that become available. To meet site requirements for science-based businesses, the key component for any development, Science Creates relies on the refurbishment of existing properties within industrial areas with few environmental constraints.

This business model faces particular challenges and opportunities:

- Challenges include the shortage of industrial space, particularly in the city centre; fit-out costs and resulting viability pressures; sourcing funding and investment; a lack of infrastructure and amenities for occupants.
- Opportunities include high-value job creation; scope to catalyse regeneration; enhancing the mix of uses within mono-functional industrial areas; and delivering social value.

More information on Science Create's work is provided in our original representations (refer to Sections 2-3).

3. Our Representations into Matter 8: Economy and Inclusive Growth, Issue 8.1 *‘Whether policies E1 – E8 are justified, effective and consistent with national policy’*.

Within this section we respond to the Key Questions in the context of our previous comments on Policy E6 on Affordable Workspace (Response ID Number. 445). In essence, our key points related to how the Policy could be more proactive in specifying where and how this policy will be applied, notably:

- The threshold at which affordable workspace is sought (for example, Brent has adopted a threshold of 3,000sqm of employment floorspace).
- The areas in which this is sought (generally designated employment areas or regeneration areas).
- The types of Development in which this is sought (employment or mixed-use development).
- The proportion of new floorspace sought (e.g. 10%).
- The type of users this is let to.
- The rate of the discount applied to this space (e.g. 50%).

We also suggested this be made subject to viability, due to the likely cost implications, the need to consider how this weighs against other policy considerations in the planning balance, and how to ensure it does not impede much-needed development overall.

Accordingly, we recommended several amendments to the wording of Policy E6 on affordable workspace.

3.1 The Council’s proposed modifications

We note that, as outlined in document EXA002.1, the Council is proposing to modify the policy in the following ways:

- Setting a threshold above which affordable workspace will be sought.
- Identifying the areas in which this will be sought.
- Adding a caveat for developments that may face viability challenges.
- Defining the type of development that affordable workspace will be sought from.
- Changing the wording to provide more clarity on where the provision of affordable workspace is desirable

- Restricting the breadth of uses within Classes E and B that can be provided.

A decision tree setting out our understanding of how the proposed policy would operate is provided overleaf at Figure 1.

With this and the supporting text in mind, we respond to the Inspector's questions in Section 3.2.

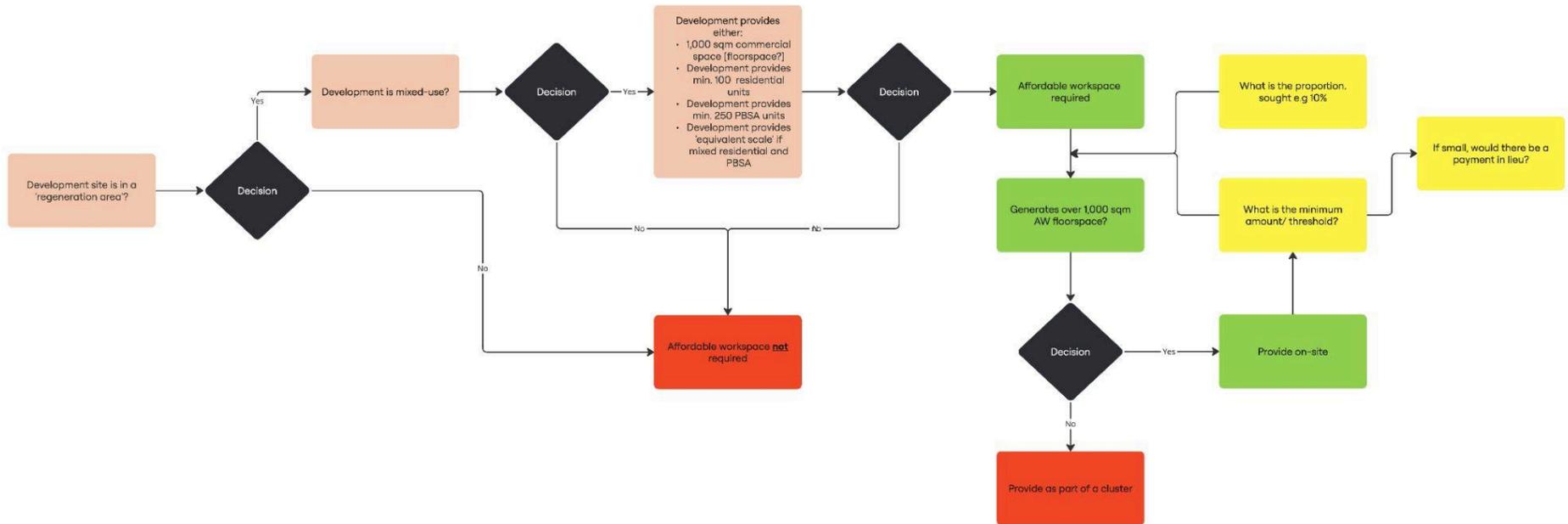


Figure 1: Policy E6 Decision Tree - Our Understanding

3.2 Further Representations in Relation to the Key Questions Set out in examination document IN4 - Appendix 1: Bristol Local Plan – Draft Matters, Issues and Questions (MIQs)

a) Is the principle of securing the provision of affordable workspace justified in principle and consistent with national policy, including those relating to planning obligations?

The Council's evidence base document Bristol Employment Land Review (2023) (ELR) emphasised that policies and interventions should strongly support the efficient use of existing employment land, including intensification and mixed-use development, due to the high demand from occupiers and restricted supply. Businesses are struggling to secure long-term certainty on leases, as landlords look ahead towards potential redevelopment.

Additionally, the West of England Employment Land Spatial Needs Assessment (ELSNA) has demonstrated through Qualitative assessment that there is a strong requirement for the supply of affordable 'lower value' industrial space to meet the needs of 'city-serving' and other specialist industries, including a requirement for affordable and specialist facilities including lab space. Therefore, it is clear that there is a need to deliver

workspace at sub-market rents. In particular, for small and medium-sized enterprises, specialist industries, health and life sciences, where companies struggle with the lack of affordable city centre workspace.

Therefore, to seek the delivery of affordable workspace as part of new development is justified in principle.

Concerning national policy, Paragraph 85 of the NPPF requires planning policies to create the conditions in which businesses can invest, expand, and adapt, and to allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraph 87 of the NPPF (Section 6) aims to recognise and address the specific locational requirements of different sectors, such as clusters or networks of knowledge and data-driven, creative, or high-technology industries.

Both the ELR and ELSNA have identified a need for affordable workspace. Therefore, through facilitating the provision of workspace at sub-market rents, this policy offers the potential to meet the objectives of national policy.

Paragraph 58 of the NPPF sets out the key tests concerning planning obligations. Specifically, they need to be a) necessary to make the development acceptable in planning terms; b) directly

related to the development; and c) fairly and reasonably related in scale and kind to the development. Paragraph 59 explains that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.

Taking the second point first, we note that the Bristol City Council: Local Plan Viability Assessment was undertaken in 2023, before the proposed amendments to Policy E6 were drafted (September 2024). Therefore, it cannot be assumed that planning applications that deliver affordable workspace above the proposed thresholds (for example, by providing above 1,000 sqm of commercial space) would be viable. Therefore, we welcome the caveat relating to viability.

Taking the first point (the three tests), of potential concern is c) relating to proportionality. Without an understanding of the proportion or amount of workspace that will be sought, it is difficult to understand whether this would be fairly and reasonably related in scale and kind to a proposal (refer back to the decision tree at Figure 1 - yellow cells). Leaving this detail to a future SPD leaves a potentially challenging negotiation until later in the process, makes it more difficult to understand the impact the policy will have on viability and lowers the status of such a requirement

overall. It would be beneficial to have a target built into policy, as with affordable housing, to provide greater certainty to developers, and ultimately speed up the development management process, which could be otherwise delayed through extended discussions around the starting point for any viability appraisal.

Therefore, returning to the Inspector's question (a), based on the above, **while the principle of securing affordable workspace is supported, we have concerns over whether it fully aligns with national planning policy in relation to planning obligations.**

b) Is the policy sufficiently clear about the circumstances in which affordable workspace would be required? In this respect, would the proposed modifications suggested in EXA002.1 be justified and effective in their own right and necessary to make the Plan sound?

Paragraph 7.47 and 7.48 explains the circumstances in which affordable workspace would be sought, subject to the site's condition and viability. Specifically, it will be sought where schemes are:

- Mixed-use; and
- In regeneration areas; and
- Above the size thresholds defined in the policy.

Our key concern is over the definition of 'regeneration areas'. As presented, this is too ambiguous and leaves the definition of 'regeneration areas' to be defined. To be consistent with the Spatial Strategy, **the nomenclature should be related back to local Plan designations i.e. Development Strategy Areas.**

We also assume that the precise boundaries of the areas in which this policy will apply would be further defined as part of the SPD.

c) In relation to the suggested main modifications, on what basis have the types of development where affordable workspace would be required, and the associated thresholds, been identified?

The overall rationale for seeing affordable workspace - as explained in the draft policy within the Reg.19 version of the Local Plan - appears to be sound. The proposed modifications suggested in EXA002.1 have addressed some of the key points raised from our previous report, and would make the policy clearer and more enforceable.

However, the **basis** for where affordable workspace would be sought i.e. in mixed-use schemes in regeneration areas where more than 1,000 sqm of commercial space, 100+ residential units, or 250 PBSA units, or a combination of the latter two is less clearly explained in the main modifications document (EXA002.1).

There is no explanation as to why such locations, development typologies or scales would be suited to, or support development of this nature. Anecdotally, there is a logic to such an approach, on the basis that the scale of development coming forward in the Development Strategy Areas (assuming these are the 'regeneration areas' referred to) would be able to support affordable workspace financially, they would offer a sustainable location for such uses, and the workspace provided would contribute towards the vitality of these places. However, there is a lack of justification for this approach within the documents put forward.

The requirements should be fully justified at the Local Plan stage, to demonstrate the policy is deliverable and robust.

d) Is the policy, either as submitted or in terms of the Council's suggested modifications, sufficiently clear as to the scale of affordable workspace that should be delivered as part of any development and/or how this would be managed?

The policy sub-text indicates that the minimum size at which an affordable workspace can operate is 1,000 sqm. However, **it does not indicate the minimum proportion sought above the relevant thresholds, for example 10%.**

The approach to affordable workspace could learn from the well-established approach to seeking affordable housing in new development i.e. developments above any given threshold seek 30% of the new housing to be affordable etc.

It would be helpful for this level of detail to be provided in the policy, as this would give greater certainty to developers and the property market in bidding for potential development sites. While this would ultimately be indicative as it would be subject to viability, it would offer a greater degree of certainty, by providing a starting point. We accept that this level of detail could be provided in the affordable workspace SPD. However, as that is just guidance, it holds less weight and therefore creates more ambiguity in its interpretation.

With regard to management, the sub-text to the policy indicates that any affordable workspace would embody the following characteristics:

- It would need to be over c1,000sqm to be commercially viable - made up of one, or multiple sites in close proximity.
- The resulting space would be managed by an affordable workspace provider or managed by the building owner.

- A draft Workspace Management Plan (WMP) should be provided to explain how the workspace will be managed, which would be secured by a planning obligation.

This appears reasonable, although we assume **there must be a threshold below which affordable workspace would fail to work on a single site**, even if it forms part of a larger cluster. **What would happen in this instance? Should there be an off-site payment in lieu? This should be addressed in the policy**, then expanded upon in any future SPD.

We also assume Bristol will compile and publish a register of affordable workspace operators, to ensure they conform to a recognized standard. We also assume that more information would come forward on how the space will be transferred to the affordable workspace providers, at what rate, the rates that may charge, etc.

e) Would it be justified, or effective, to require an annual monitoring report to be submitted as set out in paragraph 7.51?

Subject to the other comments made earlier in this document, **the requirement to provide an annual monitoring report could be supported** if the Council were to provide strong guidance on what

this should contain, and a template for its production. This should reflect that the obligation may fall on developers with little experience in managing affordable workspace, and therefore strong guidance within any SPD will be necessary to ensure it provides the data required by the Council, and is not too onerous for developers to prepare effectively and efficiently.

f) Has the policy as submitted, or the proposed modifications, been subject to robust assessment of viability?

As outlined in relation to question a), we note that the Bristol City Council: Local Plan Viability Assessment was undertaken in 2023, before the proposed amendments to Policy E6 were drafted (September 2024). Therefore, **we assume no viability assessment has been undertaken to assess the impact of the modified policy on viability.**

3.3 Summary of Compliance

Therefore, in response to the question of whether Policy E6 (as amended by document EXA002.1) unless these concerns are addressed, we do not consider it justified, effective and consistent with national policy.

4. Summary and Conclusion

These representations have been provided on behalf of a deep tech ecosystem operating in central Bristol. As a business, it delivers significant value for the city. It faces several challenges and opportunities such as the need for high funding and investment; the lack of infrastructure and amenities in available development sites; meanwhile it provides high-value job creation and regeneration opportunities.

Taking into account the policy changes proposed by the Council in document EXA002.1, we consider that Policy E6 requires some amendments and/ or further supporting evidence to be justified, effective and consistent with national policy. Specifically:

- Further explanation as to why the locations, development typologies and scales set out in the modifications would be suited to, or support development of this nature.
- Ensuring the nomenclature for locations in which affordable workspace will be sought is related back to Local Plan designations i.e. Development Strategy Areas.
- Setting out the minimum proportion (%) or amount of floor space that should be given over to affordable workspace on any given site.

- Explaining the threshold below which affordable workspace will not work on-site, and provisions for whether and how a contribution is made in such circumstances e.g. a payment in lieu.
- Further testing to understand the impacts of the policy on the viability of development.

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