

Strategic City Planning Team (CH)
Bristol City Council
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Delivered by email only to blp@bristol.gov.uk

25th January 2024

Dear Sir / Madam

Re : Bristol Local Plan Publication Version

Thank you for consulting the Land, Planning and Development Federation (LPDF) on the Bristol Local Plan Publication Version.

The LPDF was set up in April 2018 and seeks to represent the UK's leading land promoters, home builders and commercial developers.

LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing "shovel ready" land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.

The LPDF encourages its members to deliver well designed, high quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

Our key values include:

- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.
- Promoting research and an evidence-led approach to policy development.
- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.
- Championing the impact of increased housing delivery on reducing intergenerational unfairness.

- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

Housing Need

The City of Bristol, and the wider economic geography of the West of England, is one of the economic powerhouses of this country and one of the fastest growing economies outside of London. The City has significant economic growth potential and as a consequence, it should deliver a local plan that facilitates this growth. Whilst it is recognised that the Bristol Local Plan can only deal with growth within its boundaries, there is a duty on **all** the authorities across the wider West of England region, to cooperate more positively and effectively to address the economic needs of the region, and to address the housing crisis through their emerging local plans. In the absence of a wider strategic plan covering the West of England, this should be achieved through the Duty to Cooperate process.

Currently, the economic potential of the region is being held back by a lack of housing growth to meet the needs of the current and potential future population of the region. The failure to deliver the West of England Spatial Plan has contributed significantly to the significant shortfall in housing delivery across the region and this has led to a serious undersupply of affordable housing with many people living in overcrowded, unsuitable and insecure accommodation as a result. This has grave consequences for, the level of economic growth that can be delivered in the region, the health and wellbeing of those unable to secure suitable accommodation in the area, and the negative environmental consequences associated with increased commuting back into the region from locations where suitable accommodation is available.

It is understood that Bristol City is constrained in the level of housing it can deliver by its geography, the availability of suitable land and by its heritage. It is therefore incumbent upon the local authorities surrounding Bristol, within the natural Travel to Work Area for the City, to work together in a strategic way to deliver the housing needs which cannot be met within the City itself.

Bristol City Council has taken the decision, through this local plan, to disregard the 35% urban uplift which should be applied to the Standard Method figure and to use an alternative method for calculating its housing need. The LPDF do not consider, from the evidence that is presented, that exceptional circumstances exist to justify the use of an alternative to the Standard Method. If the 35% uplift is applied to the figure calculated using the Standard Method as is required by the NPPF, then Bristol City has an unmet housing need of **26,190 homes** over the Plan period.

This is a colossal number of homes which cannot be delivered within Bristol City Council's boundaries. It can only be addressed with the cooperation of Bath and North East Somerset, North Somerset and South Gloucestershire Councils providing housing through their local plan reviews to meet the full housing needs of their own area, plus an agreed proportion of the unmet needs from Bristol. Without such cooperation, the region is highly likely to experience a worsening housing crisis and the hugely negative social, economic and environmental consequences that would follow from this.

The LPDF will keep track of the progress of the local plan reviews which are happening across the region and will respond where necessary, to the various consultation stages and eventual Examination processes.

If you need any further information about these comments, please do not hesitate to contact the LPDF at the email address shown below.

Yours sincerely



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