



Bristol Local Plan Examination  
C/O Mr R Young  
Bristol City Council  
PO Box 3399  
Bristol  
BS1 9NE

7 February 2025

Dear Sir or Madam

**EXAMINATION OF THE BRISTOL LOCAL PLAN 2022-2040**  
**RESPONSE TO QUESTION 11.4 OF MATTERS, ISSUES AND QUESTIONS**

We write in respect of the Examination of the Bristol Local Plan 2022-2040 and Question 11.4 in Appendix 1 of the Inspectors' letter titled 'IN4: Matters, Issues and Questions'. Question 11.4 states:

*"Q11.4: What evidence justifies the identification of all the safeguarded areas and would the potential safeguarding of land over the plan period create a policy that would be clear, justified and consistent with Paragraph 35 of the NPPF?"*

**Callington Road Link**

We previously submitted representations during the Regulation 19 Local Plan consultation (dated 26 January 2024, given reference 289, and provided as Appendix 1 to this letter).

Our representations addressed amongst other topics the "Callington Road Link" which is proposed to be retained as a Safeguarded Transport Link under the new Local Plan. This proposed Link is shown on the Brislington Area of Bristol on the draft proposals map.

In our previous representations we suggested that there was not sufficient evidence to justify the ongoing safeguarding of this land. Our position remains unchanged for the reasons set out below.

Dominus has an interest in this matter as an owner of land that will be subject to this proposed designation.

**Response to our representations**

In the 'Brief responses to main issues raised in representations to Local Plan Publication Version (July 2024)', the Council responded to our representations noting:

*"The scheme is included within JLTP4 and the major scheme list. The WECA business case development is currently underway for the A4 Mass Transit project. This includes options for using the area identified on the policies map for improved sustainable transport provision."*



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**Our position**

Whilst the proposed link is listed in the JLTP4, we have not seen evidence that we believe justifies the ongoing designation of the Callington Road Link as a Safeguarded Transport Link in the development plan. To our knowledge, WECA's business case has not yet been produced.

On this basis, we do not consider that the Callington Road Link should continue to be safeguarded under Policy T2A.

As such, we ask for the opportunity to participate in the relevant Hearing Session concerning transport matters in Week 3 of the Hearing Programme for the Briston Local Plan 2022-2040 examination. We look forward to receiving your response.

**[Word count: 361 words]**

Yours faithfully

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**APPENDIX 1 – DOMINUS REPRESENTATIONS TO DRAFT LOCAL PLAN (PUBLICATION VERSION NOVEMBER 2023)**

**REFERENCE 289 IN THE BRISTOL LOCAL PLAN SUBMISSION STAGE REGULATION 22 CATALOGUE OF REPRESENTATIONS RECEIVED (MAY 2024)**

Strategic City Planning Team (CH)  
Bristol City Council  
PO Box 3399  
Bristol BS1 9NE

26 January 2024

**Representations to draft Local Plan (Publication Version November 2023)**

Dear Sir or Madam

We, Dominus Real Estate, write to Bristol City Council ('the Council') to submit representations to its draft Local Plan (Publication Version November 2023). The draft Local Plan is out for consultation until 26 January 2024, pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The purpose of these representations is to set out how the draft Local Plan could better meet the tests of soundness from paragraph 35 of the National Planning Policy Framework (NPPF) (2023) and statutory requirements of the Planning and Compulsory Purchase Act 2004 (as amended), and regarding the following six matters:

1. The Old Market Quarter Neighbourhood Plan and its relationship with the draft Local Plan.
2. Industrial and Distribution Areas and sites within them that are allocated for other uses.
3. Purpose-built student accommodation and its contribution to meeting housing need, and the significant importance of higher education to Bristol.
4. Co-living accommodation and its contribution to meeting housing need.
5. Hotels and visitor accommodation and its role in enhancing Bristol as a place to visit.
6. Safeguarded Transport Links and their necessity.

**Introduction**

From modest origins decades ago, we've grown into one of the UK's most dynamic family-owned business groups, including specialising in industry-leading hotels and student accommodation to award-winning residential properties, regeneration projects and mixed-use schemes.

***New Henry Street Proposals***

In Bristol, we've been working with community groups, local businesses and representatives over the past few months on our proposal to regenerate a currently industrial site on the edge of The Dings in St Philip's. This site, currently known as Premier Business Park, is bordered by Kingsland Road, Sussex



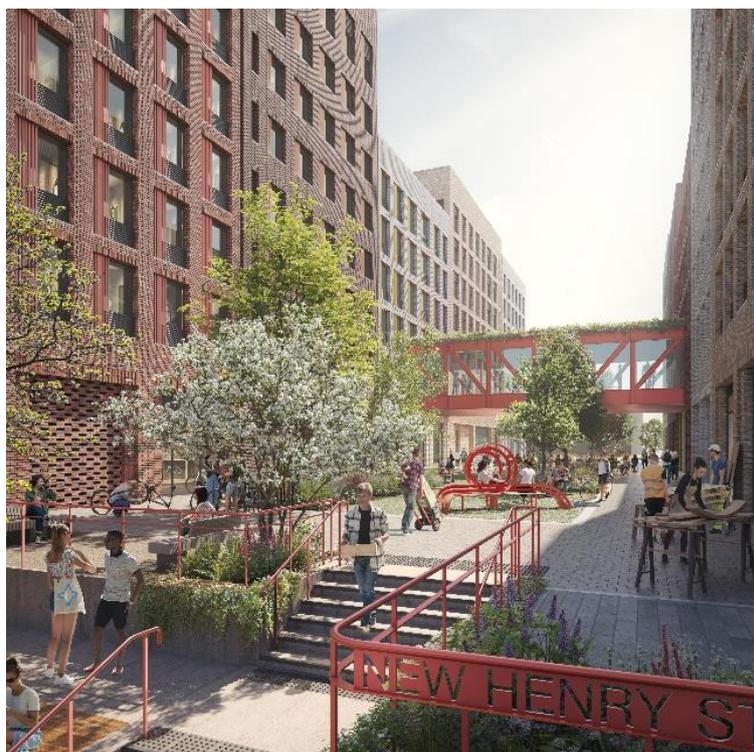
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Street, Alfred Street and the Bristol & Bath Railway Path. Through our conversations at the outset of our project we generated the following vision:

1. **Local Engagement:** Early and on-going engagement with key stakeholders to deliver long-term benefit and social value.
2. **Think Beyond the Red-Line:** Design a high-quality scheme that responds to context and contributes to ongoing rejuvenation of the East Dings neighbourhood.
3. **Delivery:** Deliver the project through a high-calibre, Bristol-based design team with a track record of positive transformative developments in Bristol.
4. **Connections:** Support enhanced pedestrian and cycle connections by encouraging sustainable travel choices with the 'front door' meeting the Bristol-to-Bath cycle path.
5. **Ground Floor Activity and Enhanced Public Realm:** Deliver active frontage and improve the local environment to enhance the sense of place and feeling of day and night-time security.
6. **Dynamic Mix of Uses:** Providing new street-level maker spaces targeted at local operators with further flexible spaces for a small food store and an education focused community offer.
7. **Student Accommodation:** Providing well located, high-quality, professionally managed student accommodation that helps to address demand for homes for student across Bristol.

**Figure: Our New Henry Street Proposals**



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In pursuing this vision we have developed our 'New Henry Street' proposals. These include activity at ground floor level including high-quality light industrial maker spaces; an opportunity for a new food store; flexible commercial uses; a space for the community (to be managed by Dominus) with an emphasis on learning; along with high-quality, professionally managed purpose-built student accommodation (PBSA). New Henry Street will also deliver a new area of public open space and will provide greatly improved accessibility to the Bath-Bristol cycle route.

## Our Local Plan Representations: Six Matters

### 1. Old Market Quarter

The Old Market Quarter Neighbourhood Plan (OMQ NP) was 'made' on 15 March 2016 and forms part of the statutory development plan. The OMQ NP in its Introduction sets out how strategic planning decisions in the past have left the area cut off from the rest of the city, making it forgotten about and suffering from low investment. It goes on to say how the OMQ NP is an:

*'...opportunity to **reverse years of decline and take advantage of a number of unique development opportunities** and a growing population have combined to drive the Old Market Quarter Forum to create this plan to **regenerate their neighbourhood and create a better connected, better serviced and more beautiful place for all.**' [our emphasis]*

The OMQ NP goes on to recognise that the Principal and Industrial Warehousing Areas (PIWAs) can have a negative impact on the local community and the vibrancy and attractiveness of the area:

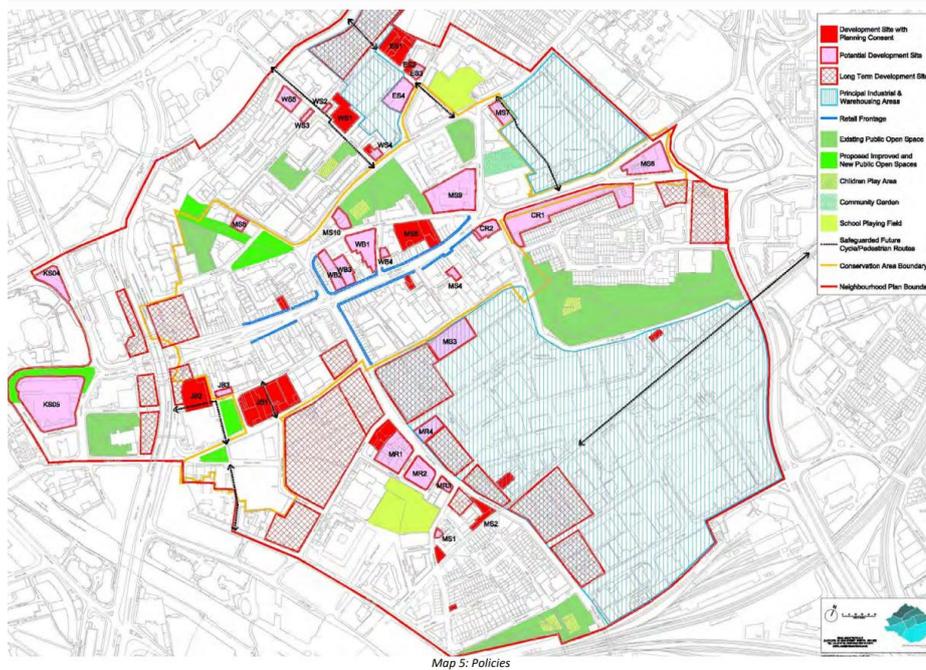
*'The Neighbourhood Plan supports the principal function of the PIWA's (see Map 5: Policies) and recognises their positive impact on the area through provision of local employment. However, the community also recognises the **negative impact that warehousing can have on the vibrancy and attractiveness of the area.** The plan therefore supports and augments the approach set out by Bristol City Council in policy DM13 of the Site Allocation's and Development Management Policies document **for a more flexible approach to the PIWAs.**' [our emphasis]*

*In Old Market Quarter, this means creating the **opportunity for changes on the edges of PIWAs, particularly on Midland Road/Kingsland Road** and possibly on Clarence Road, Stapleton Road, Little Ann Street and Little George Street where re-development may be appropriate if it can deliver certain benefits.'*

The OMQ NP's 'Map 5: Policies' identifies Premier Business Park as a 'Long Term Development Site' within the PIWA; and associated Policy B5 supports the principle of redevelopment of such sites that are on the perimeter of the PIWA, for residential and commercial uses.



Figure 2: OMQ NP Map 5



The Council will be aware that it has a statutory duty (pursuant to S19(2)(a) of the Planning and Compulsory Purchase Act 2004 (as amended)) to have regard to the government's National Planning Practice Guidance (NPPG) when preparing a new local plan (in the same way it would have to have regard to the NPPF). Guidance in the NPPG (Paragraph: 006 Reference ID: 61-006-20190723) states that:

*'Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan.'*

The Council's draft Local Plan identifies the New Henry Street land within an Industry and Distribution Area; but it does not acknowledge the Neighbourhood Plan's allocation of the site as a Long Term Development Site. By not taking the Neighbourhood Plan's allocation into account, we believe that the Council has not had regard to the NPPG as statutorily required. The outcome of this is that the OMQ NP, as a statutory representation of the local community's aspiration for the area to be rejuvenated, will be frustrated.

Indeed, the OMQ NP forms part of the adopted statutory development plan, as set out by S38(3) of the Planning and Compulsory Purchase Act 2004 (as amended). S38(5) goes on to say that:

*'If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.'*

As it stands, the OMQ NP was adopted more recently (March 2016) than the Council's Core Strategy (June 2011) and Site Allocations and Development Management Policies (July 2014). This means that the

OMQ NP's site-specific position towards the New Henry Street land currently takes precedence over the Local Plan's generic approach.

However, once the draft Local Plan is adopted, it will reverse this situation. The draft Local Plan and its generic designation of the Industry and Distribution Area will take precedent over the OMQ NP and its identification of Long Term Development Sites, by virtue of being the newer document.

We therefore request that the Council amends its draft Local Plan to take account of the OMQ NP allocation for the New Henry Street land.

## **2. Industrial and Distribution Areas**

Related to the aforementioned, draft Policy E5, which deals with the Industry and Distribution Areas, should be more flexible and refer to neighbourhood plans. Its part regarding the loss of industrial and distribution floorspace should include the below addition, which is emboldened to make clear what we suggest:

*'Development involving the loss of industrial and distribution floorspace/land within the Industry and Distribution Areas shown on the Policies Map and listed below will not be permitted unless:*

- i. The development is for a use referred to above; and*
- ii. Uses are compatible with the industrial character of the areas and would not adversely impact on the viability and continued operation of existing industrial uses.*
- iii. The land is allocated for redevelopment by a neighbourhood plan, adopted prior to this Local Plan or adopted subsequently.'***

Such a change would ensure that the draft Local Plan meets the NPPF's test of being justified.

## **3. Purpose-Built Student Accommodation**

Bristol's universities are crucial for the city and its economy. The University of Bristol is in the top 10 universities in the whole of UK, according to the Times Higher Education World University Rankings 2024. A report titled *The Economic Benefits of the University of Bristol* (February 2022), by Oxford Economics, found that:

- Expenditure by the University of Bristol, its students, and their visitors contributed £919.6 million, or around 2.8% of West of England Combined Authority's (WECA) GDP, in the 2020/21 academic year.
- Some £878.9 million of this value was retained in Bristol.
- Expenditure by the University of Bristol was found to have a GDP multiplier of 1.26 in WECA. In other words, for every £1 million of gross value added the university generated itself, economic activity rose by a further £260,000 through supply chain activity and wage expenditure.



- This expenditure by the University of Bristol, its students, and their visitors contributed 13,970 jobs within the WECA in 2020/21, 13,200 of which are in Bristol alone.
- The University of Bristol exhibited an employment multiplier of 1.25 in Bristol, which means that for every 100 people the university employs, the expenditure stimulates an additional 25 jobs in the local economy.

The University of the West of England's (UWE) economic benefits are set out in a report entitled *The Economic Impact of the University of the West of England* (March 2017), by Oxford Economics. It summarises that:

- UWE is estimated to have supported 8,280 jobs in the West of England, or one in every 79 people in employment in the area.
- Some 59 percent was as a result of UWE's expenditure, with the remainder of jobs stimulated by additional students' and their visitors' spending.
- UWE contributed £400.1 million in gross value added to the West of England economy. This is equivalent to 1.3 percent of the local economy.
- As a result of this activity, in 2014/15, UWE, its employees, additional students, and their visitors supported a £88.7million tax contribution to the Exchequer.

Bristol's two universities have undergone significant growth in recent years, and plan to continue that growth. The University of Bristol's growth was significantly above the nationally observed average, with numbers up by 7,670 between 2016/17 and 2021/22. UWE has improved its performance significantly over the last five years, increasing its student population by 8,535 between 2016/17 and 2021/22. Meanwhile, the student to bed ratio in Bristol currently stands at 2.78 students for 1 bedroom (information taken from *Student Need Assessment* (November 2023), prepared by Cushman and Wakefield, for our New Henry Street proposal). Put simply, there is a mismatch between supply and demand.

The University of Bristol's and UWE's ongoing success, and the positive effects this has on the city, cannot however be taken for granted. It depends on Bristol being attractive to talented people and providing life-enhancing experiences for students and researchers when they arrive. How students feel and how they talk about their experience to their peers influences the reputation and appeal of both that university and Bristol as a whole. Importantly, student satisfaction scores are higher amongst those living in dedicated student accommodation and lower amongst those living in the private rented sector.

With this context in mind, our concern with the draft Local Plan is that its student policy, Policy H7, does not positively seek to address this need. It says its purpose is to '*carefully manage*' PBSA, and for growth in student population to be '*matched*' by PBSA provision.

It is well established that PBSA provision counts towards an authority's overall housing target (NPPF paragraph 63) and at a ratio of 2.5 student beds equivalent to 1 conventional Use Class C3 dwelling (based on the government's Housing Delivery Test Measurement Note). It is also well established that

'*significantly boosting the supply of homes*' is a key tenet of the NPPF's housing chapter (at its introductory paragraph 60). Clearly there is a contrast in language used, which will affect decision making – the council's '*carefully managed*' versus the government's '*significantly boosting*'.

As regards for growth of student population being only 'matched' by PBSA provision, our concern is that where there is a period of no growth in student population (should this be the case and for whatever reason), PBSA schemes might be resisted. This would be erroneous for two reasons:

1. Many conventional family homes are used for student HMOs, so even if there is no student population growth, the provision of PBSAs allows family homes to be freed up by students moving out from family homes to PBSAs.
2. There is always going to be a time lag between the year(s) of no student population growth, and the completion of a PBSA scheme. While there might be no growth in the year the PBSA scheme is going through the planning process, there might be significant growth and additional demand by the time the PBSA scheme is completed and ready for occupation.

We therefore believe that Policy H7 should be worded more positively to support the provision of PBSA and should specifically reference how it meets housing targets.

Another observation we would like to make about Policy H7 is that there are various caps on the number of student beds to be permitted in various locations. It is not clear where the evidence is to justify these caps – the rationale for caps does not appear to exist any evidence-based document. Placing caps on PBSA beds will not enable the Council to meet the need. Accordingly, we consider such caps should be deleted, in the absence of any evidence supporting them.

Our final observations regarding Policy H7 are:

1. We support the provision of the policy that allows PBSA in locations that have support of the local community, through Neighbourhood Development Plans or other community-led strategies.
2. It is not clear from the Council's evidence-based document *City of Bristol Local Housing Needs Assessment* (November 2023), prepared by Opinion Research Services, where the justification is provided for the approach being proposed towards the delivery of student accommodation at discounted rents.

The above changes would ensure that the draft Local Plan meets the NPPF tests of soundness of being positively prepared and consistent with national policy.

#### **4. Co-living Accommodation**

Co-living accommodation is a relatively new concept. It is a type of non-self-contained housing that is made up of private individual rooms and communal spaces and facilities, such as kitchen, dining and living areas, and lounges, laundry rooms, gyms, and entertainment and cinema areas. The accommodation is operated and managed by the developer / chosen operator, and residents typically enter into tenancies of at least three-months, and all bills are included within the monthly rent. The

accommodation is typically (but not solely) lived in by young professionals and key workers (such as nurses) who have finished university but who still want the communal living experience (and who would otherwise choose to live in a flat share in a privately rented family house).

Draft Local Plan Policy H6 deals with HMOs and other shared-living accommodation (which would include co-living accommodation). However, its overall thrust is negative and sets out circumstances for when not to approve such development; and its focus appears to be on HMOs, rather than purpose-built co-living accommodation.

NPPF paragraph 62 is clear in stating the housing needs for different groups must be met. Co-living accommodation undoubtedly meets the needs of young professionals and other key workers who might otherwise be living in flatshares in conventional family homes. As with supplying more PBSA, the delivery of co-living accommodation can help free up family homes. The London Plan regards the delivery of 1.8 co-living beds equivalent to 1 conventional home in terms of how it meets housing targets. We understand that the council has informally taken this position also in consideration of co-living schemes.

We would therefore request that the council amends Policy H6 to give explicit support to the provision of co-living accommodation, including reference to how it meets housing needs and contributes to the council meeting its housing target. Such amendments would ensure Policy H6 is sound in terms of being positively prepared and consistent with national policy.

## **5. Hotels**

Bristol is need of more hotels at the upper-end of the market, according to the evidence-based document *Bristol City Centre Retail and Leisure Study* (October 2023), prepared by Nexus. At paragraph 3.4 it states:

*'Currently, Bristol's hotel offer is comprised of traditional / independent, budget and serviced apartments. However, there is a lack of luxury hotel accommodation in Bristol City Centre as such operators tend to focus on key cities with both a substantial tourist attraction, but also a strong office market. Were the city to see a growth in its tourism and leisure offer, as well as more office-led development then this is a potential market to be exploited.'*

Bristol's evening, night-time and culture economy is directed by draft Local Plan Policy SSE3. The relevant part states:

*'Centres will be the focus for hospitality, evening and night-time economy, culture and leisure uses.'*

*'Development proposals that protect, promote, diversify and revitalise these uses will be encouraged where they contribute to the vitality and viability of centres and Bristol's evening and night-time economy.'*

While the thrust of supporting the hospitality economy is welcomed, it would be helpful if this policy could specifically state that it supports the development of hotels and other visitor accommodation. This would remove any ambiguity about how it is to be interpreted.



We also support the principle of hospitality uses being located in centres; but we think that other locations may also be suitable. These include sites identified for such uses by a neighbourhood plan; and other land where the current use is demonstrably no longer needed, and is accessible to amenities including by public transport.

Such amendments would ensure that Policy SSE3 meets the NPPF test of soundness of being positively prepared.

### **6. Safeguarded Transport Links**

Draft Local Plan Policy T2A seeks to protect and safeguard land for potential transport infrastructure. A particular Safeguarded Transport Link is shown running northwards from Callington Road, in the Brislington Area of Bristol.

The Council's *Interim Transport Information Note* (November 2023) states that further transport modelling will need to be undertaken to understand the extent of mitigation required to alleviate trip capacity, including Callington Road. Focusing for now on Callington Road, we have not located evidence which identifies a strategic benefit for its safeguarding that justifies a planning policy designation for this land. Indeed, it seems intended to provide local relief. We would welcome clarification about this matter to ensure that the draft Local Plan meets the NPPF test of being justified.

### **Summary**

We trust that the Council can take account of these representations. In summary, our comments relate to:

1. **Old Market Quarter:** the OMQ NP is a statutory representation of the local community's aspiration for the area to be rejuvenated, and it will be frustrated by the draft Local Plan.
2. **Industrial and Distribution Areas:** the draft Local Plan Policy E5 should allow the loss of industrial and distribution floorspace in these areas where a neighbourhood plan has been adopted, or is adopted in the future, and allows for redevelopment for other uses.
3. **PBSA:** the draft Local Plan Policy H7 should be worded more positively to support the provision of PBSA and should specifically state that its provision helps meet housing targets. It should also allow for PBSA to be permitted in various locations and without the caps on beds (which is not underpinned by evidence).
4. **Co-living accommodation:** draft Local Plan Policy H6 should be amended to give explicit support to the provision of co-living accommodation, including stating that it meets housing needs and contributes to the Council meeting its housing target.
5. **Hotels:** draft Local Plan Policy SSE3 could specifically state that it supports the development of hotels and other visitor accommodation; as well as supporting their development in other suitable locations (in addition to centres).



6. **Safeguarded Transport Links:** further evidence is required to demonstrate the necessity of the Safeguarded Transport Links.

Should you require any information or further discussion, please do not hesitate to contact us.

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