

Section 62A Applications Team  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN

Our ref: 1-3HS  
Date: 16<sup>th</sup> February 2025

**Sent via the Planning Portal**

Dear Sir/Madam,

**Town and Country Planning Act 1990**

**Change of use of first floor ancillary commercial accommodation to 2no. self-contained flats. Erection of a second-floor extension to provide 2no. self-contained flats. Reconfiguration of ground floor to provide a 107sqm commercial unit, including new shopfront, and refuse/recycling and cycle storage**

**1-3 High Street, Bristol. BS9 3DR**

**Introduction**

On behalf of my client 1 High Street Ltd, I submit an application for a second floor extension comprising 2no. self-contained flats, the change of use of the first floor ancillary commercial accommodation to 2no. self-contained flats, including refuse and cycle storage at ground floor level. It is proposed to install a new shopfront, and to retain 107sqm of commercial floorspace at ground floor level.

The application site is a former Barclays Bank branch. The ground floor comprises customer space, meeting rooms, and the former bank vault, with ancillary office space at first floor level. The site has prior approval under Part 3, Class G of the GPDO for the change of use to 2no. self-contained flats (ref: 24/04389/CU, issued 19<sup>th</sup> December 2024). An earlier prior approval application, submitted under Part 3, Class MA, for the change of use of the whole building to 3no. self-contained flats was refused on the 21<sup>st</sup> October 2024 (ref: 24/03326/COU); and appeal has since been submitted against this refusal, and is pending determination (ref: APP/Z0116/W/24/3354526). Prior approval was refused only on the grounds that the loss of the ground floor retail use would erode the traditional character of the commercial core of the Westbury-on-Trym Conservation Area.

The site is in Flood Zone 1, the Westbury-on-Trym Conservation Area, there are no Tree Preservation Orders on the site, and the building is not nationally or locally listed. It also falls within the Westbury-on-Trym designated town centre and primary shopping area.

Other than the prior approvals, planning history for the site relates to the former bank use (installation of ATMs, advertising etc). Planning permission was recently granted for the removal of all external signage, external ATM, CCTV camera, night safe and an alarm box (ref: 24/00211/F), and this has been implemented.

## **Proposal**

The application is submitted to (i) erect a second floor mansard roof extension comprising 2no. self-contained flats, (ii) convert the first floor to 2no. self-contained flats, and (iii) reconfigure the ground floor to create a 107sqm commercial unit with new shopfront, and refuse/recycling and cycle storage.

A new shopfront is proposed at ground floor level for the retained commercial unit, which would have 107sqm floor space, including storage and toilets. 2no. internal refuse and recycling stores are proposed for the 4no. flats, with louvred doors, and a new entrance to flats 1 and 3 (on the left-hand side of the building) from the High Street. Flats 2 and 4 (to the right-hand side of the building) would be accessed from the existing access to the first floor, on the Stoke Lane elevation.

2no. self-contained flats are proposed at first floor level, a one-bed, two-person flat, and a one-bed, one-person flat. These would largely replicate the layout of the Class G prior approval, but with a slight reduction in floorspace to provide stair access to the new second floor.

A mansard roof extension is proposed, with 4no. dormers to the front elevation, in line with the first floor windows. The roof would be finished in slate, with metal cladding to the dormers. A new string course is proposed below the parapet wall, and the painted window surrounds at first floor level would be stripped back to the stone work.

The application is accompanied by a design, access and heritage statement, which further details the heritage context, and the design approach.

## **Planning analysis**

### *Land-use Principle*

With reference to the loss of first floor ancillary commercial floorspace, it is a strong material consideration that the site has an extant prior approval for change of use to residential. In this context, there can be no good reason to resist this part of the current proposal. Furthermore, NPPF§125d states that decisions should promote and

support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops).

The retained commercial space, at 107sq.m, is still generous in size and functional for various occupiers. Importantly, a new shopfront is proposed, which would make the unit more attractive for a wider variety of uses (the current shopfront, which served the former bank, lacks street presence). The loss of the first floor of the commercial unit would not harm the viability or function of the premises as a town centre use, or that of the wider town centre, therefore complying with the objectives of policies BCS7, DM8 and DM9 of the Local Plan.

In terms of the introduction of additional residential accommodation at second floor level, NPPF§125e states that planning decisions should, *“support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions – including mansard roofs – where the development would be consistent with the prevailing form of neighbouring properties and the overall street scene, is well- designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.”* §125c states that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and that such proposals should be approved unless substantial harm would be caused.

As such it can be demonstrated that the loss of some first floor commercial space would not harm the function of the premises or the designated town centre, and the introduction of additional residential accommodation on brownfield land, in a highly sustainable high street, town centre location, would be acceptable in principle. Therefore, the principle of development should be supported.

### *Housing mix*

Policy BCS18 supports a neighbourhood with a mix of housing tenure, types and sizes to meet the changing needs and aspirations of its residents. The supporting text states that evidence provided in the Strategic Housing Market Assessment (SHMA) suggests that new developments should provide for more accommodation for smaller households. The SHMA was updated in February 2019 for the wider Bristol area. This states that single person households are expected to represent 40% of the overall household growth: an increase of 34,000 from 2016 to 2036. The proportion of single person households is therefore predicted to increase from 31.7% to 33.3%, whilst households with children are predicted to remain constant, at 26.2%.

The 2019 SHMA states that, *“whilst there is projected to be an increase of 34,000 extra single person households, only 14,600 extra dwellings have one bedroom (5,000 market homes and 9,600 affordable homes). This reflects that many single person households will continue to occupy family housing in which they already*

*live.*” (para 2.20). The SHMA predicts that the need for 1-bed accommodation will increase by 16.8% over the period, whilst the need for 3-bed houses will increase by a broadly similar figure (17.6%).

At ward level, just 7.5% of dwellings are one-bed, with 75.8% of dwellings comprising 3 or more bedrooms. This compares with city-wide figures of 16.2 and 55.4% respectively. Whilst the figures at LSOA level are a bit more balanced (13.7% and 59.5%, reflecting the town centre location), they are still some way from the city-wide figures. In this context, and given the findings of the SHMA, the provision of four additional one-bedroom dwellings would contribute positively to the housing mix of the area.

### *Residential amenity*

The site adjoins a Tesco convenience store to the southeast side, and a mixed-use residential conversion to the southwest. The nearest residential gardens to the rear are at the rear of 1-3 Stoke Lane (some 18 metres from the proposed second floor windows), with the rear gardens to Cambridge Crescent at least 30 metres away, and the rear gardens to the remainder of Stoke Lane at least 21 metres away. As such, there would be no issues of loss of privacy or overshadowing, particularly given the mansard roof design, and that the extension would lie to the north of all adjoining development. From the front elevation windows, views would be across the roundabout, with the nearest facing windows (the upper floors to the shops opposite) at least 21 metres away and at oblique angles.

In respect of future occupants, all four units would be dual-aspect, and would exceed NDSS requirements, thereby providing policy-compliant, good standards of living environments.

### *Design, and impact on the Westbury-on-Trym Conservation Area*

The site falls within the Commercial Core character area of the Westbury-on-Trym Conservation Area. The 2015 Character Appraisal classes the building as a neutral one within the Conservation Area, being sandwiched between character buildings to the southwest (along Stoke Lane) and southeast (along Westbury Hill). The adjoining building to the southeast (formerly the Foresters Public House, converted to a Tesco Express in 2013) is identified as an Unlisted Building of Merit.

The character appraisal notes that it is a lively area, with pavement cafes, pedestrians, bus stops, parked cars and through traffic; as well as an important focus for the local community. The commercial character is defined by the buildings that directly address the pavement edge, with ground floor shopfronts containing a mix of independent provision. There is overall a strong townscape, with a number of listed buildings and key unlisted buildings of merit.

The site, as a neutral building, is the weakest part of this section of the character area, and does not form part of a strong streetscene with adjoining properties, appearing as something of an anomaly in relation to the traditional shopfronts on both Westbury Hill, and the remainder of the High Street to the north.



*View from Westbury Hill*



*View from Canford Lane*





*View from High Street*

The site is not visible from Canford Lane, and is only really viewed as part of the commercial core from High Street to the north. However, the lack of any signage to the ground floor of the commercial use at 1-3 Stoke Lane (currently used by a letting agent), and the recent removal of the signage to the application site, together with the fact that the building does not have any of the predominant materials (stucco render with limestone dressings, red brick, timber joinery etc) results in the site appearing visually separate from the commercial core. None of the positive characteristics of the character area readily apply to the application site, and the general feel is of a liminal building between the commercial uses and the residential uses on Stoke Lane.

The proposal would see the reinstatement of a more traditional shopfront, with increased fenestration, new fascia boards and pilasters. The existing bath stone surrounds to the first floor windows have been painted white; it is proposed to remove this paint to reveal the stone underneath, and also to introduce a new string course band between the first floor window headers and the parapet.

The proposed mansard roof extension (which is explicitly supported by the new NPPF) would be finished in slate, with metal clad dormers aligned with the first floor windows. Whilst it is noted that mansard roofs are not commonplace within the Conservation Area, given that the application site is the only building of its kind in the area, and that three storey buildings are fairly prevalent within the area, the design approach taken is considered suitable, particularly given the NPPF emphasis on upwards extensions.

Taken together, the external changes would be amount to successful additions to the property, sit well within the context, and would enhance the character and appearance of the Westbury-on-Trym Conservation Area, in accordance with the Framework, Local Plan policies BCS22 and DM31, and the suite of design-based policies.

### *Transport and movement*

The site is located within the settlement boundary of Bristol, and the Westbury-on-Trym designated town centre boundary. As such the site is in a highly sustainable location, with access to a range of services and facilities, where car-free development can be supported.

The commercial unit would retain storage space for refuse and recycling storage, and would be serviced by a private waster operator, as per the previous arrangement. 2no. refuse and recycling stores are proposed for the residential units, in the same general locations internally as for the extant Class G prior approval scheme. The stores would direct and level access on to the street for collection.

8no. cycle storage spaces are proposed, in excess of the DM23 requirement of one per bedroom, with level, direct access from the street.

The proposals are made as car-free, given the constraints of the site, unit sizes, and the town centre location, which is highly accessible to alternative means of transport to private car trips.

As such, the proposals raise no adverse transport and movement issues to warrant refusal.

#### *Other matters*

Biodiversity Net Gain – the site is wholly sealed surface, either building or hard-surfacing. As such, the proposals are exempt from mandatory biodiversity net gain (BNG) requirements. There are opportunities to incorporate bat and/or bird enhancements (boxes), which the Applicant would be amenable to providing, via planning condition.

Sustainability – the application is supported by an Energy/Sustainability Statement, which details the proposal's credentials against policies BCS13-15. An Air Source Heat pump is proposed for heating and hot water for the HMO, in accordance with strategies. As such, the application complies with the Council's planning policies in these respects.

### **PLANNING BALANCE AND CONCLUSION**

The Council has a stated 2.2-2.4 year housing land supply, an out-of-date Local Plan, and has not passed any of the last four Housing Delivery Tests. As such, §11d of the NPPF is currently engaged, and in this context the provision of additional housing (four extra one-bed flats which would add to the housing mix locally) should be given substantial weight, and the re-use of brownfield land, in part through an upward extension, is clearly in line with the recent changes to the NPPF. As such, the default response to the proposal should be to approve.

The proposal would provide a high standard of accommodation and represent a valuable addition to the housing stock in a sustainable location, within excellent sustainable transport links.

The proposals would not harm the function of the commercial premises or the town centre. Conversely, the newly refurbished unit with new shopfront would represent an attractive opportunity within the commercial core, in a building that has been vacant for several months.

The design of the extension is appropriate and represents a number of visual benefits for the site and this section of the conservation area, and would not harm the amenities of neighbours.

Against this suite of public benefits there is a minor loss of ancillary floorspace for the commercial unit, which would still remain viable and attractive to business occupiers. As such, it is considered the proposals comply with the Framework, when taken as a whole, and planning permission should be forthcoming.

If any further information is required, please contact us as soon as possible so that we can provide this prior to a decision being made.

Yours faithfully,

**John Rooney, on behalf of 1 High Street Ltd**