



Planning, Design & Access Statement

Bull Inn
333 Crews Hole Road
St George Bristol
BS5 8BQ

January 2025

Prepared by
Caldecotte Group

Site •

Bull Inn, 333 Crews Hole Road, St George, Bristol, BS5 8BQ

Report for •

Wellington Pub Company

Document revisions •

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Caldecotte Group • 15 London House • Swinfens Yard • Stony Stratford • MK11 1SY
Tel • 01908 560644 •

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1.0 Introduction

1.1 This document has been prepared to support a Full Planning Application for the demolition of the existing building and erection of a single three storey block containing 6 x 2 bedroom dwellings and 3 x 1 bedroom dwellings “the proposal” on the site of the Bull Inn on Crews Hole Road “the application site”.

1.2 This planning statement should be read in conjunction with the following drawings and documents:

- Location Plan
- Proposed Floor Plans (Ground, First & Second Floor)
- Proposed Elevations
- Proposed Views
- Public House Viability Report
- Ground Investigation
- Drainage Strategy & Maintenance Report
- Preliminary Ecology Survey in BNG metric
- Topographical Survey
- Existing Measured Building Survey (Floor plans & elevations)
- Heritage Statement
- Energy Statement
- Coal Mining Risk Assessment
- Transport Note with Tracking
- Highway Search
- PV and ASHP Data Sheets

1.3 This planning application is being made under Section 62A of the Town and Country Planning Act 1990 which allows applications for planning permission and reserved matters consent to be made directly to the Secretary of State where the Local Planning Authority for the area has been designated for this purpose. In this instance, applications for “non-major development” meeting a certain criteria, can be submitted to the Planning Inspectorate, rather than Bristol City Council for determination.

1.4 The designation specifically relates to applications for “non-major development” that does not meet or exceed any of the criteria below:

- For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. **Met – the proposed development is for 9 units on a site of 0.17 hectares.**
- The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more. **Met – the floor space of the proposed building is 700sqm.**
- Development carried out on a site having an area of 1 hectare or more. **Met – the site area is under 1 hectare.**

2.0 Site and Surroundings

2.1 The Bull Inn is a brick built detached property located on the eastern side of Crews Hole Road. The site is triangular in shape, with the widest part to the north at the junction

between Crews Hole Road and Niblett's Hill. The site narrows down to a boundary with a woodland associated with Dundridge Park.

- 2.2 The building is located at the northern end of the application site. The existing building is two storeys in height with a smaller single storey extension to the side and is set back slightly from Crews Hole Road. A trade patio is located to the front, between the building and the road. Parking for 13 vehicles is set in front of a landscaped bank, on top of which is a development of four detached blocks of flats, accessed off Bull Lane. A trade garden is located at a higher level behind the existing building.
- 2.3 The site is separated from nearby property as a result of the levels and barriers such as the road.

3.0 Proposed Development

- 3.1 The application seeks full planning permission for the erection of a single three storey block of apartments following the demolition of the existing building on site.
- 3.2 The proposed building would be positioned in the same location as the existing building. Similarly, the principal elevation would be eastern facing, as is the case now. Internally, the proposed building would have two entrances, each serving a stair core. Core 1 would serve units 2, 3 and 6, with Core 2 serving the remainder of the proposed flats.
- 3.3 The existing accesses off Crews Hole Road would be retained and re-configured to serve a parking area for up to 11 parking spaces. A dedicated communal bin store and cycle store is provided near the site entrance for easy accessibility.
- 3.4 The schedule of proposed residential accommodation is as follows:

Plot	Location	Bedrooms	Size (GIA sqm)
1	Ground	2	73.1
2	Ground	2	79.6
3	Ground	2	71.6
4	First	2	71.4
5	First	2	71.9
6	First	2	75.6
7	Second	1	59.7
8	Second	1	55.3
9	Second	1	55.8

Figure 1: Schedule of Accommodation

- 3.5 Each dwelling comprises an open plan living and kitchen/dining area together with shared bathroom and either one or two bedrooms. Each flat also benefits from a private amenity space by way of a patio or balcony in addition to communal landscaped areas around the building including a large communal garden at the rear (replacing the existing trade garden).

4.0 Planning History

4.1 A pre-application enquiry was sent to Bristol City Council in December 2023 for a development similar to that proposed. Reference will be made to the response throughout this statement where appropriate. There is no other relevant planning history.

4.2 The headline responses were as follows:

1. The loss of the public house will need to be justified through robust viability assessments as it is not considered that there are any alternative public houses within a reasonable walking distance of the application site
2. The demolition of the existing building would be harmful to the Avon Valley Conservation Area and would not be supported

4.3 These have been addressed and I kindly refer you to the accompanying heritage statement and viability report for further information on each of these points.

5.0 Planning Policy Framework

5.1 Applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

The National Planning Policy Framework (NPPF)

5.2 The NPPF (revised December 2023) provides the Government's framework for delivering sustainable development and facilitating economic growth through the planning process. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The introduction of the NPPF is a material consideration in planning decisions.

5.3 The following sections of the NPPF are considered directly relevant to the current application:

- 2: Achieving sustainable development
- 4: Decision making
- 5: Delivering a sufficient supply of homes
- 8: Promoting healthy and safe communities
- 11: Making effective use of land
- 12: Achieving well-designed places
- 16: Conserving and enhancing the historic environment

Bristol City Council Development Plan

5.4 The adopted Development Plan comprises the following key documents:

- Core Strategy (2011)
- Site Allocations and Development Management Policies Plan (2014)

5.5 The Council has a number of supplementary planning documents and practice notes, which will be referred to in this statement where relevant.

- 5.6 The Council have prepared a new local plan which will set out how Bristol will develop up to 2040. This was submitted for examination in April 2024 and policies from this document will be referred to where relevant.

6.0 Planning Analysis

- 6.1 The main considerations of this planning application relate to the following matters:
- Principle of Development
 - Loss of the Existing Use Public House
 - Design & Heritage
 - Other Material Considerations

Principle of Development

- 6.2 Paragraph 11 of the NPPF outlines the objectives with regards to the presumption in favour of sustainable development where development proposals must accord with adopted development plans, this goes hand in hand with Paragraph 60 of the Framework that seeks to significantly boost housing supply. Paragraph 70 makes it clear that small and medium sized sites such as the application site can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. London Plan Policy GG4 notes that those involved in planning and development must ensure that more homes are delivered.
- 6.3 Paragraph 124(c) gives substantial weight to the use of suitable brownfield land within settlements for homes and other identified needs. Significantly, Paragraph 124(d) 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, and building on or above service yards, car parks, lock-ups and railway infrastructure).
- 6.4 Locally, Policy BCS5 seeks to deliver 30,600 new homes between 2006 and 2026 and aims to deliver new homes within the built up area to contribute towards accommodating a growing number of people and households in the city and promotes the development of new homes on previously developed sites across the city. Policy H1 of the new Local Plan sets out the housing requirement for Bristol; an annual average minimum of 1,925 new homes to be delivered over the plan period to 2040. The supporting text adds that there is an emphasis on exceeding this number.
- 6.5 The application site is located within the built up area and is considered a previously developed site (brownfield land). This is echoed in the emerging Policy UL1, which seeks to maximise opportunities to re-use previously developed land and develop it to optimum densities. In line with Policy BCS20 and UL2, the re-development of this site should be acceptable and the proposed density of 52 dwellings per hectare, complies with these policies which seek to achieve higher densities of 50 dwellings per hectare at a minimum.
- 6.6 Policy BCS18 of the Core Strategy states that 'all new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation mixed, balanced and inclusive communities'. Development should aim to contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists.

- 6.7 The pre-application response acknowledged that proposed development would boost housing supply, and noted the proposal's acceptability in terms of providing smaller units given the site's location within the Crews Hole LSOA which identifies an imbalance of unit type and sizes. "The site falls within the Crews Hole LSOA. Census data (2021) shows that a significant majority of residences (70.5%) are houses as opposed to flats, maisonettes, or apartments (29.3%). The prevailing accommodation size is 3 bedrooms (44.4%). Smaller proportions of dwelling size include 1 bedroom (13.2%), 2 bedroom (30.4%), and 4 or more bedrooms (12.0%). The above Census data would lead to the conclusion that in this instance, there is an imbalance between flats and houses within the local area and that there may be a need for smaller dwellings in the area."
- 6.8 The response went on to add that although the proposed development would increase the concentration of two bedroom dwellings, these are considered to offer a greater degree of flexibility when compared to one bedroom dwellings and so would remain in accordance with Policy BCS18. Emerging policy H4 would be met given that the proposals do reflect the local housing profile/evidence.
- 6.9 As a result, it is considered that the proposed re-development of the application site, for a development of the type proposed, would be consistent with the Council's spatial strategy and vision as highlighted in the Local Plan and the principles of the NPPF.

Loss of the Existing Use

- 6.10 The premises closed in September 2023 and is not listed as an Asset of Community Value. Consideration has been given to relevant planning policies contained within the NPPF and the adopted Bristol City Council Local Plan, namely Policies BCS12, DM5 and DM5.
- 6.11 Notwithstanding the general principle of residential development being acceptable as noted above, Policy DM6 is specifically relevant as this covers public houses, whilst the other two policies mentioned, concern community facilities more generally. Policy DM6: Public houses aims to prevent the inappropriate loss of pubs by stating that: 'Proposals involving the loss of established public houses will not be permitted unless it is demonstrated that:
- i. The public house is no longer economically viable; or
 - ii. A diverse range of public house provision exists within the locality.
- 6.12 The policy establishes two tests to determine the acceptability of an application involving the loss of a public house - the 'viability' and 'diverse range of public house provision' tests. In order to be successful in their application for the loss of a public house, applicants will need to demonstrate that one of these tests has been met. This Policy is carried through to the new local plan in Policy SSE8.
- 6.13 The Council has a Supplementary Planning Guidance document on public houses titled DM6: Public Houses Practice Note (adopted in October 2022) which outlines the criteria against which applications involving the loss of a public house are to be assessed.
- 6.14 This application is being made on the basis of meeting part ii) of the Policy. As identified in the practice note, there are two components to part ii; what is deemed to be 'within the locality' and what constitutes a 'diverse range of public house provision' capable of 'meeting the collective needs and expectations of the whole community.' This is the same as the main thrust of Paragraph 97 in the NPPF which states that to deliver the social,

recreational and cultural facilities and services the community needs, planning policies and decisions should:

- (a) Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- (c) Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day to day needs

6.15 Policy DM5 states in part 1), "Proposals involving the loss of community facilities land or buildings will not be permitted unless it is demonstrated that the loss of the existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality or, where the use has ceased, that there is no need or demand for any other suitable community facility that is willing or able to make use of the building(s) or land." This is carried through to the new Local Plan via Policy CF2.

6.16 These paragraphs do not prohibit the re-development of public houses but rather that planning decisions should be made to ensure that the local community's ability to meet its day to day needs are not jeopardised.

6.17 In terms of the definition of 'within the locality' (Policy DM6 part ii), the practice note states that a walking distance of 800m (not radius), roughly equivalent to 10 minutes walking, should be used when mapping alternative provision. Policy DM5 would met if there would be no shortfall in the provision or quality of such uses within the locality.

6.18 In order to fully explore this issue, a report has been prepared by Thomas E Teague which considers the location of and equivalence of alternative provision within the area, accessibility issues and other site specific viability matters. The Thomas E Teague concludes The Bull Inn to be no longer viable as a public house and that there is adequate alternative provision within 800m as per Policy DM6 and the associated Practice Note.

6.19 Although reference has been made to licensing issues in the pre-application submission, the Council dismissed these. Although the impact of widely publicised dissatisfaction with the premises is somewhat subjective, it cannot be ruled out that this would create some reputational damage which could contribute towards the overall negative sentiment towards, and ongoing viability of the property. Similarly, the council did not accept that given the area's constraints in terms of boundaries (i.e. the River Avon), a 1 mile (1600m) would in fact be a more appropriate measure when having regard to natural and hard barriers to movement. Indeed, the 1,600m distance is used within the CAMRA viability test as being a suitable and reasonable distance in which to assess the area from which the local trade is derived from. Notwithstanding this point, the policy can be met regardless given the presence of two alternative public houses within 800m.

Design & Heritage

6.20 The property is not statutory listed but does fall within the Avon Valley Conservation Area. It does not feature on the Council's Local list of valued buildings (2020). There are no adjacent statutory listed buildings.

6.21 The NPPF (paragraph 200) requires applicants: 'to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance'.

- 6.22 The Planning Practice Guide (PPG) clarifies this additional requirement under ‘What is the main legislative framework for planning and the historic environment?’ where it states that: In addition to the normal planning framework set out in the Town and Country Planning Act 1990.....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.
- 6.23 Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.
- 6.24 The PPG states under ‘What is the setting of a heritage asset and how should it be taken into account?’ that: The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.
- 6.25 The PPG states under ‘How to assess if there is substantial harm?’ that: What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework.
- 6.26 Having regard to Policy BCS22, which states that development proposals should safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including conservation area, and Policy DM31 and emerging Policy CHE1, which states that development should preserve or where appropriate enhance those elements which contribute to their special character or appearance, a heritage statement has been prepared which considers the significance of this building. Not wishing to repeat the content of this comprehensive report, the architectural merit of the Bull is considered average and that its loss through demolition will have negligible impact on the conservation area – the loss of the Tar factory, arguably had a much greater impact on the surrounding area.
- 6.27 A review of the Avon Valley Conservation area enhancement statement produced in 1993 (there is no current conservation appraisal), there is no specific reference to the property and the conservation area designation appears to be more strategic in nature, created as a result of the coal-mining, quarrying and lead-mining activities of the 18th and 19th Centuries and for its “secluded riverside charm enhanced by an 18th Century settlement pattern”.
- 6.28 The lack of statutory listed buildings in the area would confirm this, leading to a sense that the built environment is less important than the general landscape/natural environment in this instance.

- 6.29 Therefore, we consider a well designed replacement building to have much greater benefit and that the harm to the heritage assets (the physical building and wider conservation area) is at the lowest end of the scale and that the special interest of the conservation area would continue to be preserved.
- 6.30 Unfortunately we find that in many cases, Councils approach the demolition of buildings in conservation areas in absolute terms, and do not consider that a replacement building may actually improve the character and appearance of the area. We believe that the proposed building does this. The design has a “blended” approach, taking some influence from the existing building and combining this with contemporary principles, commensurate with modern day living.
- 6.31 This generates a sustainable and fit for purpose building that is attractive and sympathetic to its surroundings that will stand the test of time.
- 6.32 In terms of design guidance, Policies BCS21, DM26 and emerging Policy DPM1, highlight the overall and general design direction that should be taken in new developments, with Policy DM29 and DC1, providing additional detail. Policy DM29 expects proposals for new buildings to incorporate active frontages and clearly defined main entrances facing the public realm that emphasise corners and reinforce the most prominent frontages. Developments will be expected to provide appropriate natural surveillance of all external spaces; and incorporate high quality detail of an appropriate scale and proportion, arranged in a coherent way that contributes positively to the overall design approach of the building.
- 6.33 It also states that proposals for new buildings will be expected to ensure that existing and proposed development achieves appropriate levels of privacy, outlook and daylight. New residential development should provide dual aspect where possible, particularly where one of the aspects is north-facing.
- 6.34 The proposed building replaces the existing building and sits in the same place on a similar sized footprint. The primary frontage to the east would be maintained with the other elevations providing adequate surveillance over the balance of the site, including the parking area. The proposed development would maintain an active frontage at ground floor and the extent of the green space would be significantly increased by the development, creating a softer edge to the application site.
- 6.35 All of the proposed flats would be dual aspect, with no north facing aspect. In accordance with Urban Living SPD, all habitable rooms would have access to natural light and each flat has a choice of views (i.e. east and west or east and south etc).
- 6.36 Having regard to amenity space, the development of new homes will be expected to incorporate high quality safe and usable private amenity and play space. This should be provided as private balconies or gardens. Communal gardens and roof terraces accessible to all dwellings may be used where it is demonstrated that it is not feasible to provide individual private outdoor spaces. The size and design of private and communal outdoor and play space should follow the guidance set out in the Urban Living SPD.
- 6.37 The SPD states that a minimum of 5sq m of private outdoor space should be provided for a 1-2 person dwellings and an extra 1sq m should be provided for each additional occupant. Each flat would benefit from their own private amenity space, by way of patio

or balcony at a size which meets or exceeds the required amount. Furthermore, the site lends itself to providing additional outdoor space and so a number of communal amenity spaces have been created.

- 6.38 All of the proposed dwellings meet the nationally technical housing standards for minimum internal space requirements. A schedule of accommodation showing the floor areas can be found in Figure 1. All of the dwellings are also accessible and adaptable (compliant with Building Regulations M4(2) Category 2: Accessible and adaptable dwellings), as required by emerging Policy H9.

Other material considerations

Transport

- 6.39 The trip generation of the proposed use would be reduced when compared against the current consented use.
- 6.40 Having regard to parking standards, we understand that 1 parking space should be provided per 1 bed and 1.25 parking spaces per 2 bedroom dwelling. The existing parking provision amounts to 13 parking spaces and these spaces would continue to be utilised. We calculate that 11 spaces are required, however a total of 12 parking spaces have been proposed for the 9 dwellings and so the standards are considered met.
- 6.41 The existing accesses would be maintained and the development would adopt an “in and out” arrangement in a similar to fashion to the current parking layout. This enables the sufficient manoeuvring space to enable vehicles to enter, turn and exit the site in a forward gear.
- 6.42 The proposed access and general layout would have a more beneficial impact on the quality, character and distinctiveness of the area as it would introduce a greater amount of soft landscaping opportunities to the front the site which would improve its overall appearance. At present, when the site when viewed from Crews Hole Road, it is dominated by the existing building and hard standing.
- 6.43 A dedicated refuse store is also provided in accordance (Policy DM32 and emerging Policy DC4), of a size and type appropriate for the development, informed by the Council’s requirements as set out in the Waste and Recycling guidance note. A schedule of the waste storage (including specific bin types) are shown on the architectural drawings.
- 6.44 Cycle storage is provided within a dedicated cycle store at ground floor or within the private amenity spaces of the ground floor dwellings.
- 6.45 Policies BCS10, DM23 and emerging Policy T1, T3a and T4a are considered met in respect of transport development principles. The proposed development would not give rise to unacceptable traffic conditions.

Ecology & Trees

- 6.46 An extended Phase 1 Habitat Survey has been undertaken. The report finds that the pub existing building is considered to have ‘negligible’ potential. The unmanaged garden is

considered to be of very low ecological value. Overall, the proposals will not result in significant ecological impacts.

- 6.47 It should be noted that the existing slopes which are currently covered in vegetation would remain. The parking area does not infringe upon this as there is a retaining wall at the bottom of the slope, defining the start of the parking bays. The existing trade garden at the rear would be repurposed as communal amenity space.
- 6.48 The loss of building and hard-standing will not affect habitats of any ecological value, and the loss of the existing garden will be compensated for through the creation of new amenity areas associated with the proposed residential development. No trees would be lost as a result of the development. (Policies BCS9, DM15 and emerging policies BG1 and BG4). These areas are also of size, large enough to accommodate on-site food growing by residents if they so wish (emerging Policy FS2).
- 6.49 According to calculations include with the Phase 1 ecology report, the proposals will also result in a biodiversity net gain of 89% habitat units. Therefore, the development delivers a measurable net gain in biodiversity as required by emerging Policy BG3 and exceeds the minimum 10% requirement.

Energy Efficiency & Sustainability

- 6.50 A development's ability to contribute to both mitigating and adapting to climate change is covered by Policy BCS13 and emerging Policies NZC1, 2 and 3. A report accompanies this application demonstrating how the proposed development achieves high levels of energy efficiency including the use of Air Source Heat Pumps and PV panels.

Contaminated Land

- 6.51 Having regard to the proposed residential use which is considered a sensitive end use and the requirements of Policy DM34 and HW1B, a Phase 2 Ground Investigation has been carried out together with a coal mining risk assessment, both of which confirm that there are no overriding issue with contamination that would prevent permission from being granted.

Drainage

- 6.52 Policy BCS16 and emerging Policy FR1 requires new development to incorporate water management measures to reduce surface water run-off and ensure that it does not increase flood risks elsewhere. This should include the use of sustainable drainage systems (SUDS).
- 6.53 The site is located within a Flood Zone 1. A drainage strategy has been prepared by following infiltration testing to BRE365 showing SuDs features in line with the SuDS Manual philosophy, taking into consideration site constraints.

7.0 Conclusion

- 7.1 The proposal represents a policy compliant scheme which would make effective use of underutilised land and is an appropriate form of development on previously developed land. The site is suitable for a small scale residential development and would provide a good opportunity to deliver an immediate supply of new dwellings, contributing to the Council's housing targets.

- 7.2 The proposed development of 9 new apartments is a well-considered scheme that aligns with the strategic objectives of the adopted and emerging Bristol City Local Plans. Material considerations have been considered early on so that a sustainable, attractive and high-quality development is proposed.
- 7.3 The proposal constitutes sustainable development and national advice within the NPPF requires decision makers to adopt a presumption in favour of such proposals. We respectfully request that the application be approved.