

Comments on application to demolish the Bull Inn, 333 Crews Hole Rd, BS5 8BQ and build 9 flats on the cleared site – Ref. S62A/2025/0082

Summary

I request that the proposals shown in this planning-application be refused.

In my opinion development proposals for this site should consider the following:

- i) Retain the existing building as a public house as first preference
- ii) If (i) is demonstrated to not be economically viable, then the viability of alternative uses for the building of benefit to the community, should be considered including combinations of retail and dwellings.
- iii) If (i) & (ii) are demonstrated to not be economically viable, then designs that convert the 1904 building to residential use should be considered.
- iv) In the event of the existing building being retained (options (i) (ii) or (iii)) then additional sympathetic development in the car park area should be considered.
- v) In the event that it is demonstrated that no viable design that incorporates the existing building can be produced, then the design should not be constrained to the existing building footprint with adjacent car park. A design should be developed that makes best use of the whole site, includes the provision of affordable housing and protects the appearance of the Conservation Area.

It is unfortunate the applicant has ignored the helpful feedback to their pre-application from the Bristol City Council planning officer and via that officer, the local volunteer planning group. The applicant has also consistently ignored offers from the local community, since November 2023 to engage in discussions about the possible future of the site.

The decision of the government planning inspector should be one that will lead to the best use of the site for the current and future community of this area. In my view the Planning Inspector should reject this application in order to allow further discussions on the future of the site.

Detailed Response

These are the issues I have considered in my response to this planning application.:

- 1) Business viability including Policy DM6 – alternative provision
- 2) The desire of the local community for a pub
- 3) The inaccuracies of the heritage assessment
- 4) Reasons why the outline design is unacceptable and how it can be improved
- 5) Required surveys and reports

1) Business viability and Policy DM6 – Alternative provision

The business viability report quotes Policy DM6 giving 800 metres as an acceptable distance of alternative provision of a public house.

The neighbourhood of Crews Hole is constrained topographically and by a lack of public transport. Topographically the area is bound by the River Avon with no footbridge for 0.7 mile

and is in a river valley at the base of steep hills. The nearest pub suggested, in the viability assessment, is named at the Horse and Jockey, and the distance, given, using a route that no pedestrian would wish to use, that includes a 1-car width section of road on Niblett's Hill with no footway, is 0.7671km. The route is steep and requires a 50-metre ascent within that distance. The pub is extremely small, with limited opening hours and is in no way comparable to the Bull in options for facilities.

The second nearest pub listed in the viability assessment is the Lord Raglan. The distance given is 0.7977km. While the walking route proposed is better it still involves a steep ascent approaching 50 metres. Against this is a very small pub with limited opening hours.

Neither pub could be reached by anyone of average fitness within an "easy 10-minute walk". It should also be noted that many of the nearest potential customers for the Bull live on river side of the pub i.e. to the west and would have more than 800 metres to walk to the two nearest pubs, described above.

The viability report has not taken into account the potential growth of the market for the Bull. As examples:

- new flats are being built immediately above the Bull on Niblett's Hill at the junction with Bull Lane,
- a planning application has recently been made for 7 houses at the foot of Fir Tree Lane steps at the junction with Niblett's Hill,
- a planning decision on the development of 75 apartments is nearing completion on a site on Blackswarth Rd that is a flat, enjoyable riverside stroll to the Bull.

The Bull Inn is the last remaining community space in Crews Hole, the two chapels having been converted into flats and the other pub, the Lamb Inn having been demolished and replaced by housing. It is also the last retail space; small groceries such as the nearby Marquess of Worcester and Jack Britton's shops, have closed over the years.

When the footbridge to St Anne's had to be closed for an 18-month period, the lack of level, pedestrian access to a grocery store caused considerable distress to residents unable to drive and physically unable to make the ascent to alternatives.

Given these facts it is essential that the continued use of the site as a public house is demonstrated not to be economically viable. The viability statement may show this but the author himself states he has no access to the accounts relating the operation of the pub. He also states in one of perhaps one of the most telling comments in the viability report (page 22, section 25.7) "in my view that longevity is as much a consequence of them (other successful pubs) being run well as a reason for their success." One thing that the Bull Inn has not been in recent years, is a well-run pub.

The viability of using the site for other businesses that would benefit the community, such as a café, micro pub and/or general store perhaps with post office facilities and community meeting space should also be considered. Unexplored in the viability statement or any other documents with this application is the option of a combined operation of, for example, a small convenience store and a micro pub.

An approach was made in 2024 to a local councillor by someone interested in established a micro-brewery. I did pass on the management company's contact details to the councillor.

Large pubs in the area have been converted into convenience stores (the Bell on Bell Hill Rd, BS5 7NF is an example having become a Tesco Express), the associated parking being useful for customers. Micro pubs are experiencing some success. The newly opened Pickled Parrot micro pub on Church Rd, BS5 8AH is attracting significant custom from nearby residents, definitely promoting a community "vibe" and customers are even making the effort to walk from more than 30 minutes away to make use of the facility. Dogs are welcome at the Pickled Parrot which it makes it even more attractive to those out for their evening walk.

Nor is the option explored of partnering a takeaway with the pub which I have seen in successful operation elsewhere, removing the need to hire kitchen staff and pay related energy costs

Any economic assessment should take into account passing trade, both commuters and those visiting the area as well as the local community. The pub was popular with dog walkers, the River Avon Trail passes within 30 metres of the pub and there are the nearby beauty spots of Troopers Hill Local Nature Reserve, Conham Valley River Park and Dundridge Park.

It should be noted that considerable trade was noted at the Bull from tradesman finishing their day's work and stopping, on their commutes from sites elsewhere. It will be on police records that the manager of the pub was vociferous in 2016 in asking for the removal of the Community SpeedWatch location immediately opposite the pub as it would "deter custom". The Community SpeedWatch location was moved.

N.B. It should be noted that since the closure of the Bull in September of 2023 there has been no promotion of the site as a commercial business. It has not been offered for sale or rent. A member of the St George Community Association contacted a representative of the owner via the owner's website in October 2023 enquiring about future plans for the site and offering help with consultation with the community on the owner's proposals. The response at the time was that the owners had not yet decided the future of the site. Repeated approaches have been made and ignored since that date.

2) The desire of the local community for a pub

In 2013 when the Bull Inn was closed there was concern in the local community that the closure would be permanent and likely to lead to the pub being replaced with housing. This led to a successful application for the pub to be designated as an Asset of Community Value.

The subsequent management of the pub in a way that led to frequent visits by the police (see evidence given at the time concerning the withdrawal of the premises licence), neighbourhood disturbances and other negative behaviour meant that a renewal of the Asset of Community Value designation was not requested.

However, given that for many years prior to this mismanagement the pub acted as:

- a) A polling station
- b) Meeting point for the community
- c) Provided employment for local residents
- d) The only licensed premises in easy walking distance, often with a food offering

a period when the premises were mismanaged should not prevent a law-abiding, commercially viable business operating.

There has continued to be great interest in the future of the pub evidenced by the number of enquiries on social media such as NextDoor, Facebook and Reddit. In conversation the consensus seems to be that local people would welcome the re-opening of a “good pub” preferably with a food offering, there is also support for the possibility of a small grocery store on the Spar model.

There has been an increase in interest since this planning application was published. A comment on the St George Community Association Facebook page:

“Loss of a pub or change of use e.g. local shop is a bit [REDACTED], the immediate area lacks these so a shame to see it being completely residential”

The Friends of Troopers Hill Facebook page attracted 21 comments when publicising the planning application. These included:

- questions about how to respond the application
- “...I’d broadly support housing – tho perhaps with some commercial space a shop/café/bar at the lower level?”
- “The area would thrive with a lovely restaurant/coffee shop, mini market here!! We are already disadvantaged with either a dark river walk or steep hill hike to access a shop if without a car. We need local amenities not more flats”
- “Shame to lose another local facility, more houses but no shops/pubs/restaurants in the immediate area...Went downhill when the wrong crowd were invited”
- “Shame it closed, been going there approx. 35 years”
- “Met my husband in this pub and had the best times there. Absolutely heartbreaking to think this special place will be demolished”

Perhaps one of the saddest things about the applicant having submitted this application directly to the government planning inspector is the lack of opportunity local residents have to see others’ comments, for them to support, add to or refute, thus helping the planning officer come to a decision. The only way to comment is via an email and not onto the open platform of the Bristol City Council planning system which protects the identity of those who comment but does show what comments have been made.

The Spring 2024 issue of “Pints West” the CAMRA (Campaign for Real Ale) branch magazine (see [REDACTED]) contained a half page article about the Bull Inn on page 13, describing the popularity of the pub and its value. The piece ends with the paragraph “Bristol Pub Group will support any local community initiative to save the Bull Inn for the benefit of local residents and would like to see it restored to its rightful place as a much-valued community hub”.

I hope that if this planning application is rejected the applicant carries out open consultations with local people to inform a new plan for the site. We would suggest they work with the St George Community Association and the local St George Troopers Hill councillor to achieve the consultations.

3) The Inaccuracies of the Heritage Assessment

The heritage assessment accompanying this application appears to be riddled with errors, particularly with reference to the changes to the external appearance of the existing structure in the 1920s and 1930s. Below is the architect's drawing and internal layout published 12th October 1900.



As can be seen when comparing this plan to a recent photo, taken from the heritage assessment document (see previous page) there has been little change to the outward appearance apart from the addition of a low single storey section to the right where the horse and cart are shown in the drawing. There is now, of course, a fire escape to the left of the building.

It is interesting that no authorship or source is given for the heritage assessment, nor an acknowledgement to the significant selection of information and at least one photograph from the Friends of Troopers Hill website. [REDACTED]

I should particularly like to point out that some comments attributed, in the heritage assessment to the Bristol City Council planning officer, were in fact made the local volunteer planning group, particularly the comment referring to the 'underwhelming design' included with the original pre-application which did not resemble the design accompanying this application.

The heritage statement was useful in pointing out that the Bull Inn is on the local monuments list. Something that is not mentioned in the design and access statement when discussing heritage and the impact of demolition.

As the viability report states, substantial investment is needed to return the pub to a state to become a profitable concern. However, the owners of the pub seem to have signally ignored the deterioration of the pub over a number of years. Significant improvement works were carried during a brief period in 2013 but then these ceased and deterioration started once more.

In section 16 of the National Planning Policy Framework section 16. Conserving and enhancing the historic environment, it says in paragraph 209 'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.' Paragraph 216 states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

In 2012 I asked the opinion of a successful local licensee their thoughts on the viability of the pub. At that point the lease was being advertised and seeing the price being asked the opinion given was that no-one would make a profit paying that level of lease. Could the pricing of the lease have led to the subsequent problems with licensees that resulted in the temporary loss of the premises licence and the losses that occasioned the last closure?

During the period of closure from September 2023 I have had to contact the management company on several occasions on issues ranging from saplings growing from the roof to squatters. The level of care for the building was not, in my opinion, exemplary during that time.

4) Reasons why the outline design is unacceptable and how it can be improved

The design and accessibility statement gives reasons why this application can be made straight to the government planning inspector, in particular given the size of development, less than 10 dwellings. The statement also writes of the desirable density achieved in a space of 0.17 of a hectare.

Options for increased density, better levels of space and natural light for residents seem to have been ignored in this design. A very simple design option would be to place parking under the building as has been successfully achieved in the nearby St George Park. This arrangement would also have the advantage of less visibility of parked cars and better security for car owners.

The orientation of the building and roof design seems particularly incompatible with the solar panels. In the plans they are shown on the east facing section of the roof. Not only is this not the optimum position on any building, south-facing is the usual recommendation, but the east facing roof is extremely like to be overshadowed by building on Niblett's Hill/Dundridge Lane and particularly by the Bull Lane flats directly above.

The design of the building seems to give a vague nod to what has gone before, a shadowy concept of the Bull Inn. It does not seem sustainable to demolish a building that can still be used for its original purpose or a similar one, to only build a pale imitation that does not fully exploit the opportunity given for interesting well-designed buildings in sufficient number to offset that initial waste of resources spent in demolition.

In fact, the existing building does not relate to the local vernacular at all, perhaps deliberately so, when the building was designed in 1900, for the building to stand out and attract people to it as a drinking establishment.

If demolition is the way to go then surely design should be aimed at providing the best use of the land available to provide accommodation, whether for business or residential purposes.

If there is a wish to return to the vernacular of this conservation area then the existing building that was the Marquess of Worcester off-licence, grocery store and bakery, can be observed less than 50 metres away at '19A Niblett's Hill', as identified and pictured on page 63 in the heritage assessment, see below.



The building that was formerly on the site of the Bull Inn, albeit in the southern section of the site, can be viewed at least partially in the photos on page 25 of the heritage assessment, see below. It is the double-gabled white building whose upper part is seen of the right of the photo shown overleaf.



A better image of the building can be seen on [REDACTED]

The Bull Inn that the current building replaced was at the south end of the plot so the pub was in a position to continue business until the new building was ready (see maps from the 1880s).

Remaining with the same orientation as the existing building makes the building very dark at the back (the east side):

The plan of the ground floor shows 3 apartments.

Unit 1 is shown with a living room to the rear of the building where the provision of natural light will be extremely poor with east window facing a bank and the north window the retaining wall for Niblett's Hill. There will be a bedroom at the front of the building, enjoying most of the light and facing the busy, noisy Crews Hole Rd. It would seem sensible to have the bedrooms at the quieter, darker side of the building with the living room at the front, receiving the greater quantity of natural light. Steps seem, from the plan, in any case to be provided to the upper garden from the north side of the building so a side access could still be provided to Unit 1 to access them.

Unit 2 - this apartment, more sensibly has its 2 bedrooms at the back of the building (the east side) where the light is worst, blocked by the bank but the long narrow kitchen diner appears truly unattractive. No measurements are given other than in square metres but in proportion it does look as if there would be little room for people to pass each other in the kitchen when passing between the dining and living area.

Unit 3 – again a bedroom is at the noisy front of the building nearest the busy Crews Hole Rd and its wall is against the hallway from the front door so passing footfall of other residents will be a disturbance.

For unit 3 the living and dining area is in the darkest area of the building, against the bank to the east of the building and no window to provide natural light has been put in the south-facing wall presumably because that is where the bin store has been located.

While I can see that the living areas have been put at the back so the residents can access the tiny amount of ‘amenity space’ the amenity space will be in shadow all the time and not be a good place for relaxing, hanging out washing, growing plants in pots or any other kind of activity for which an amenity space is usually used.

Unit 6 – again a bedroom is at the front of the building directly facing traffic noise.

Unit 9 - again a bedroom is at the front of the building directly facing traffic noise.

By keeping to the footprint and orientation of the original building the design is extremely constrained and a result provides extremely poor living accommodation to potential residents.

A disabled parking space has been positioned near the proposed building. It would be helpful to understand if the 3 ground floor flats are intended to be accessible. There has been a lack of development locally that caters for the needs of those needing accessible homes.

The placing of the bin store removes the option of more windows in the south facing wall and I pity the poor future resident with a balcony right over the bin store.

The elevations do not actually show the bin store or bicycle storage when displaying the south-facing part of the building so it is hard to see how they will blend in with the building, nor even if there is roofing over the cycle storage or bin store.

While it is pleasing to see that heat pumps are included in the design there seems to have been a design error on the location of the photovoltaic panels. They have been affixed to the east facing roof, which is not the best source of sunlight and likely be completely overshadowed by housing on Niblett's Hill and the Bull Lane flats.

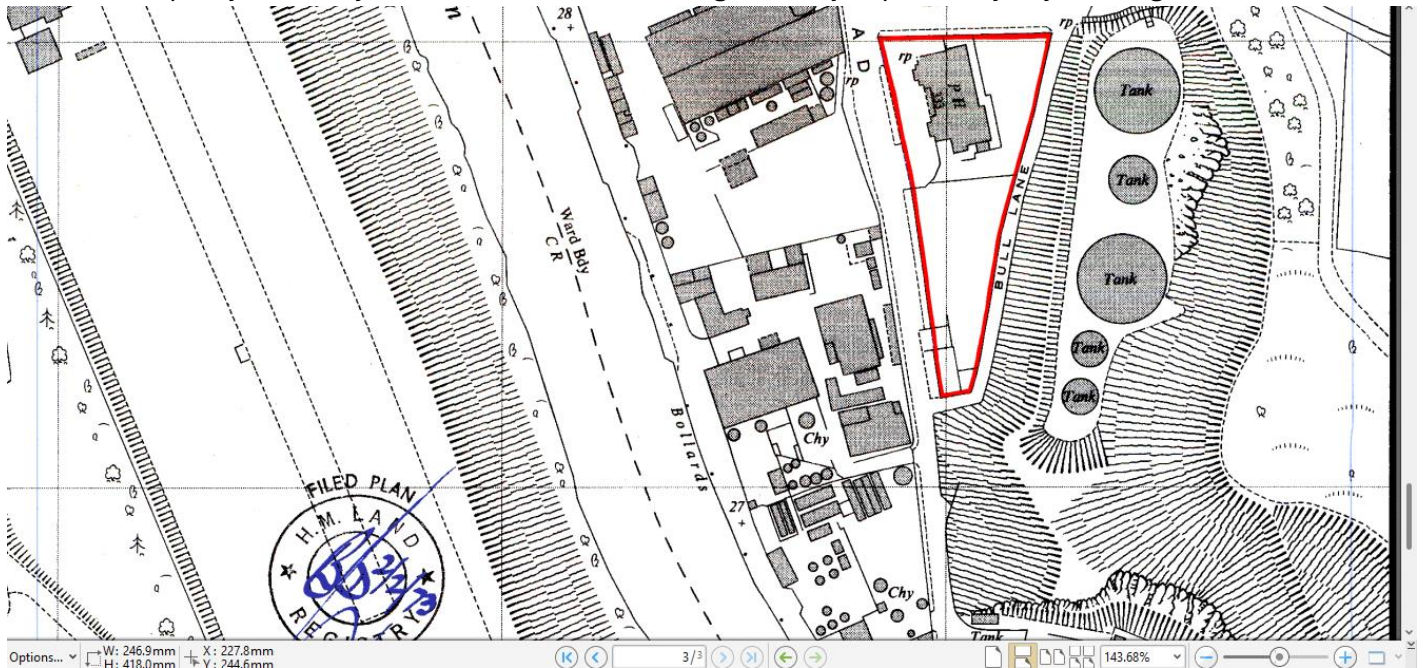
Again, this seems to have been caused by the lack of thought in the orientation of the building. The ideal position for solar panels is a large expanse of roof facing south. This is not an option in this design.

In addition, I can see no mention of batteries to store and release the energy from the solar panels. This is the most efficient use of solar energy and it would be a major oversight if batteries have not been included in the design.

5) Required surveys and reports

The Windrush Ecology Ltd Preliminary Ecological Assessment was made in October 2024 and it would appear did not include the land rising up the bank above the pub and the single storey part of the building. As can be seen from the land registry plan (BL36444) overleaf this bank is at

least partly owned by the Bull Inn and could be significantly impacted by any building or



demolition work.

The assessment did not mention the presence of Japanese knotweed. This invasive species was identified and the person then managing the premises, [REDACTED] notified. It may have been successfully treated.

The assessment did not mention that the bank is used as a wildlife corridor by deer and badger, it may have been the ecological report have been redacted to avoid publicising the presence of badgers. As they are common in the area it would be surprising if there were no setts or attempts at setts on the property, particularly as the property has been vacant for over a year.

It would also be surprising if slow worms and common lizards are not using the bank given how common they are in local gardens.

The planting recommended by Windrush Ecology seemed very appropriate. In addition a wildflower mix including yellow rattle could be of benefit to the bank or if the underlying soil is similar in acidity to the nearby Local Nature Reserve, Troopers Hill, perhaps plants chosen to replicate that habitat could be used, see plant species list on the Friends of Troopers Hill website [REDACTED] particularly including broom (*Cytisus scoparius*), ling (*Calluna vulgaris*) and bell heather (*Erica cinerea*).

In addition, the bank and garden may of particular use to mining bees and other bees species which would not have been observed by Windrush Ecology in October. Red Data Book 1 (nationally rare) bee species have been recorded on the nearby (less than 200 metres) Troopers Hill Local Nature Reserve. See [REDACTED] for the 83 species of bee recorded there. Given the nationally rare invertebrate species found in the area a survey by an entomologist would be helpful in informing how development and demolition should best be managed.

As can be seen in the land registry map shown on the previous page, unmentioned in the heritage assessment, there used to be tanks containing tar on the land immediately above the Bull Inn, where Bull Lane flats are now located. Prior to the start of construction of the Bull Lane flats, 18 months were spent clearing the land.

In my view, it would be worthwhile carrying out soil contamination investigations prior to proposing any rebuilding on the land currently occupied by the Bull. The previous owners of the tanks, British Steel (the owners that succeeded Wm Butler & Co.) seemed to have a remarkably laissez faire attitude to their responsibility when these tanks were in use. In one incident in the 1960s when tar escaped into Crews Hole Rd i.e. at the level of the Bull Inn, from these tanks, a spokesman was quoted as saying one should expect pipe leaks.

The information about escapes of tar was initially raised by a former local resident and then confirmed via newspaper articles found in the British Newspaper Archive.

Local people have also referred to these tanks containing naphthalene, which was indeed produced at Butlers but I have not found confirmation that the tanks contained this.

In Conclusion

I hope for the reasons given above this planning application will be rejected and the opportunity regained to benefit current and future residents of this area by the optimum use of the land currently occupied by the Bull Inn.

Wednesday 26th March 2025