

Planning Application S62A/2025/0082

Demolition of existing building and erection of a new block of apartment

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

## Summary

I note that this application is not being considered via the usual route, involving publication on Bristol City Council's online planning portal; consultation with local residents and organisations; and decision taken by local Councillors with advice from Local Authority Planning Officers.

However, there is no reason to believe that the Inspector will not base their decision on Bristol City Council's planning policies, which after all are derived from national guidance under NPPF and other legislation. Therefore my comments are based on the assumption that these policies still apply.

I therefore object to the above planning application for the reasons set out below.

1. Paragraph 2.6.1 of Bristol City Council's Planning Policy DM6: Public Houses requires 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.'

The Council's DM6 Practice Note (October 2022) provides clarification that "Applicants are expected to use the Campaign for Real Ale (CAMRA) Public House Viability Test as the method for demonstrating that a public house is no longer viable", and in addition that "Applicants will be expected to provide at least the last three trading years of audited accounts."

Two lists then follow, describing reasonable measures to improve the viability of the public house, and requiring that the applicant show that these measures have been pursued.

A list prefaced "diversification of market offer" includes Serving food; Providing sports TV; Offering darts, games, pool, skittles or snooker facilities; Events like pub quizzes, comedy, craft fairs or live music; Renting out space for meetings, classes or community events; Providing bed and breakfast accommodation; and changes to the premises themselves.

A second list details possible changes to the premises which could improve viability.

The Practice Note refers to both lists, requiring that evidence be provided to "show these measures have been considered, attempted and implemented. Applicants are expected to demonstrate that the public house has been operated positively and not run with a view to closure."

No audited accounts are included in the current application, and while the Viability Study provided attempts to show that some of the measures in the first list have been attempted, their effect is unquantified.

The application has failed to demonstrate that it meets the viability test for DM6.

On a personal note:

For eighteen years until 2019, I lived about 100 yds from The Bull, and I watched with dismay as the offering was reduced by a succession of managers. Firstly, the two cask beers were reduced to one, then to none; then the very popular Sunday Roast was discontinued; and in recent years the emphasis was on offering mass – produced drinks at the lowest prices in the area. This brought in a different clientele from further afield, while people living nearby (myself included) visited less and less often. While this does not necessarily show that trade was run down deliberately, it is certainly the case that little effort was made to attract the potential trade from visitors to the area's attractions: the Trooper's Hill Nature Reserve and the Avon Valley river walk, and the things that had previously brought local residents in were replaced by an offering and behaviours that deterred many of them.

2. Turning to test ii) above, that "A diverse range of public house provision exists within the locality", Para 4.1 of the Council's DM6 Practice Note explains that this means within a walking distance of 800m of the site, not simply within 800m radius from the site. The Viability Study goes into considerable detail about a number of potential alternatives, although it does acknowledge that only two of them could be construed as within 800m. Even in these two cases, the gradients are such that only a very fit, energetic walker is likely to contemplate them.

Interestingly, a check on the quoted walking distances using the Map Pedometer app whose name is printed on the maps in Appendix 2 of the Viability Report gave the distance from the Bull to the Lord Raglan as 0.844k (not 0.7977 as shown) and Bull to Horse & Jockey as 0.805 rather than 0.7671, using the same route in each case. Even these distances are questionable, as the route shown to the Horse & Jockey includes a stretch of narrow, steep hill with no pavement and a section of Fir Tree Lane comprising poorly lit steps, which some would avoid after dark because of some large, threatening dogs living adjacent to the steps. While this route may be possible for a fit walker, many people would not consider it a safe choice.

In view of these comments, I do not believe the application meets the "alternative provision" test for DM6.

3. For the above reasons, the application also conflicts with Bristol City Council's policy BCS12 which requires that "existing community facilities should be retained unless it can be demonstrated that there is no longer a need to retain the use or where alternative provision is made" – the pub is the only community facility of any sort at Crew's Hole, and there are certainly residents who would like to be able to walk to some kind of communal facility near where they live.