

Planning Heritage Design and Access Statement

**Change of use of vacant pre-school back
to single two bed flat**

**6 Gordon Road (ground floor),
Bristol, BS8 1AP**



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1 INTRODUCTION

- 1.1 This is a Planning, Heritage, Design and Access Statement to support an application for the reversion of the ground floor from the “Montessori” pre-school use granted in 2012 (12/00010/F) back to the previously existing 2No. bed ground floor flat use. The previously existing school use has relocated to Hotwells Primary School approximately 1km to the south west and the ground floor is currently vacant. The previously existing flat is understood to have been originally created in the 1950s. The school has been previously noted as a use within Class F1 and there are no permitted development rights to change to non F1 uses.

- 1.2 No.6 (together with No.8) is a Grade II listed semi detached villa situated in the Clifton Conservation Area. The list description reads:-

GVII

Pair of attached houses. Early-mid C19. Stucco and limestone ashlar with limestone dressings, lateral and brick party wall stacks, roof not visible. Double-depth plan. Neoclassical style. Each of 3 storeys, attic and basement; 2-window range. A symmetrical front has a central 4-window pedimented section broken forward with clasping pilasters, to a moulded coping ramped up over the pilasters, and a central reeded party wall strip; outer 2-storey blocks, a later storey added to No.8, with corner lateral stacks forming clasping pilasters. Side entrance porches, No.8 with a half-glazed C20 door, No.6 a 6-panel door. Outer windows have 2/2-pane sashes and blind semicircular arches above, and 8/8-pane sashes to the middle. Matching rear elevation. INTERIOR: lobby to a central stair hall with a lateral open dogleg stair with stick balusters and a large turned newel, and 6-panel doors. SUBSIDIARY FEATURES: attached rubble and brick front garden walls and 2 pairs of capped rusticated piers.

(NB: On the basis that the building was first listed in 1977 and the flat existed from the 1950s, it is assumed that the “INTERIOR” description is referring to No.8.)

- 1.3 The property benefits from a gated access off Gordon Road to a gravelled parking and turning area (minimum 3No. spaces) and a good sized front, side and rear garden. The rear garden is then divided between the garden flat and the “school” and the first / second floor maisonette generally uses the front garden. The site benefits from a bin store area and two Sheffield bike stands located behind the front wall to the south east of the existing walled access (NB: added pursuant to the 2012 permission). There is a mature existing Lime tree, the subject of a Tree Preservation Order, located approximately halfway down the south eastern boundary but this is unaffected by the proposed development.
- 1.4 The school was accessed via a short flight of steps to a porched front door on the south east front elevation (see front page photograph). The existing layout comprises two rooms either side of a central hallway with rear bathroom. The two rooms to the right are currently classrooms and will revert to two bedrooms, the bathroom will remain in the current location off the hall and the two rooms to the left comprise a classroom at the rear and a kitchen/staff room to the front. These rooms will revert to a living/dining room and the kitchen (simply retained). No physical alterations are currently proposed.
- 1.5 While review of statistical and property data e.g. the latest Clifton Ward Profile, demonstrates a statistically higher proportion of 2No. bed flats compared to the Bristol

average, the property is a specific existing (former) flat where there is no practical ability to extend or any realistic alternative other than a reversion to the previous use. There is also a pressing need for all types of residential accommodation in the City.

- 1.6 The application site is in an area that is highly sustainable with easy cycle and walking access to a full range of commercial, social and community facilities. The area is generally mixed in character with houses and flats, the University Students Union and service and commercial properties. The property is being marketed by Richard Harding Estate Agents.

2. THE DEVELOPMENT

- 2.1 Permission is sought for the simple change of use only of the existing small pre-school back to its previously existing flat use. No material external or internal alterations are currently proposed. The proposed flat has a floor area of 84.52m² and this breaks down as follows:-

Room	Floor Area (m ²)	Comment
Porch	4.23	
Hall	11.45	
Bathroom	3.86	
Bedroom 2	14.97	Ground floor RHS front
Bedroom 1	21.05	Ground floor RHS rear
Dining/living	16.31	Ground floor LHS rear
Kitchen	12.65	Ground Floor LHS front
Total	84.52	

Table1: Floor areas breakdown

- 2.2 As can be seen the proposed flat and each bedroom meets the appropriate, "Technical housing standards – nationally described space standards (minimum 61m² floor area for a 2bed 3p flat). There is a safe existing vehicular access and a good sized on-site parking and manoeuvring area together with convenient bin / recycling area and bike stands (already provided pursuant to the 2012 permission) in the gravelled drive area hidden behind the existing roadside wall.
- 2.3 No physical external or internal alterations need be made to the property other than internal decoration and a "new/refurbishment" of the current child orientated bathroom. The bathroom refurbishment will in any event need to be done should a flat purchaser require a Mortgage.

3 PLANNING HISTORY

- 3.1 Relevant planning history includes:-
 - 10/02684/F - Convert existing garden flat to Montessori nursery school for maximum 20 children for 38 weeks a year – Refused 27 August 2010
 - 10/02685/LA – Convert existing garden flat to Montessori nursery school for maximum 20 children for 38 weeks a year – Consent 27 August 2010
 - 12/00010/F - Convert existing ground floor flat to pre-school use for maximum 24 children over 38 weeks per year (with associated external alterations comprising revised car parking arrangements, security railing and cycle storage area) – Permission 10 July 2012

- 12/02574/LA Alterations to existing boundary wall. Erection of new gates and installation of new railings. Alterations to access drive – Consent 13 August 2012
 - 21/01459/CLE - Application for a Lawful Development Certificate for an existing freestanding mono-pitched roof shelter – Refused 29 June 2021 (NB: this was a retrospective application and while no planning issues were identified it was refused on the basis that the structure was fixed to the existing boundary wall and Listed Building Consent was therefore technically required. This was disputed.)
 - Various tree related applications
- 3.2 The 2012 planning permission was an alternative to the 2010 refusal and the 2012 Listed Building Consent authorised the minor revisions to the existing access and installation of gates. The 2012 permission, while permanent, is restricted and effectively temporary being limited to 24 children; no more than 38 weeks a year and between 08:30 – 16:00 Monday to Saturday. These restrictions were imposed for “residential amenity” reasons.

4 PLANNING POLICY CONTEXT

- 4.1 The Development Plan for the application site (so far as generally material to this application) comprises the Core Strategy (2011) and the Site Allocations and Development Management Policies Local Plan (2014).
- 4.2 Policy BCS5 aims to deliver new homes within the built up areas of the City primarily on previously developed sites.
- 4.3 BCS10 prioritises the pedestrian and the cyclist ahead of the private car and prioritises the location of development in sustainable locations where sustainable travel patterns can be achieved.
- 4.4 BCS12 seeks to retain existing community facilities unless it can be demonstrated that there is no longer a need to retain the use or whether alternative provision is made. Community facilities are noted in paragraph 4.12.2 as potentially including “...education establishments...”.
- 4.5 BCS13-15 asks that development be designed to help mitigate climate change through high energy efficiency standards; the use of renewable energy; adequate waste and recycling storage and by locating development where alternative travel choices to the car exist.
- 4.6 BCS18 asks that residential development meets appropriate space standards. BCS21 seeks “high quality design” and BCS22 seeks to safeguard historic assets.
- 4.7 DM1 restates the presumption in favour of sustainable development.
- 4.8 DM5 is a criteria based policy and seeks to protect all community facilities but the acknowledged emphasis (para 2.5.3) is on “...community land and buildings” as opposed to private facilities. The policy generally seeks to prevent the loss of community facilities unless (generally):-
- The loss would not create, or add to a shortfall of the existing use or there is no demand
 - The building is no longer suitable or conveniently adaptable
 - The use is replaced elsewhere

DE Planning

- 4.9 DM23 seeks appropriate facilities for pedestrians and cyclists and car parking in accordance with the standards set out in Appendix 2 of the plan. The car parking standards are “maximum” thereby allowing for “car free” development where appropriate.
- 4.10 DM31 requires the protection and where appropriate enhancement of heritage assets.
- 4.11 DM32 requires the provision of adequate waste and recycling facilities.
- 4.12 Other material considerations include the emerging Local Plan (submitted to SoS April 2024); Space Standards Practice Note (2021); Climate Change and Sustainability Practice Note (2020) and Waste and recycling: collection and storage facilities (updated 2022). Each of these documents is briefly summarised below.

Emerging Local Plan

- 4.13 Delivering new homes is a core objective of the emerging Local Plan and Policy H1 focuses on this as a leading objective through amongst other things a focus on urban living and regeneration.
- 4.14 Policy CF2 is the same as adopted policy DM5 apart from a minor rewording to one of the criteria to read, unless the loss, “..could potentially disadvantage the local community...”
- 4.15 DMP1 and DC3 refers to general design principles, DC1 requires compliance with the Nationally described space standards (see below), DC4 refers to the provision of adequate waste and recycling facilities and Policy CHE1 refers to conservation and the historic environment and seeks to ensure no harm arises from changes of use and that the character and appearance of Conservation Areas are at least preserved (NB: generally reflecting the statutory requirements in relation to Listed Buildings and Conservation Areas).

Space Standards Practice Note (2021)

- 4.16 The Nationally described space standards state that a 2No. bed 3 person flat should have a minimum internal floor area of 61m² and a double bedroom of at least 11.5m² and a single bedspace of at least 7.5m².

Climate Change and Sustainability Practice Note (2020) and Addendum (2023)

- 4.17 Requires a proportionate exploration of energy use and waste management.

Waste and Recycling Storage Collection Facilities

- 4.18 Requires detail of waste and recycling facilities.

National Planning Policy Framework (2024 with minor amendments 2025)

- 4.19 The NPPF states that there is a presumption in favour of sustainable development and that this has economic, social and environmental components. Promoting and making the efficient use of land and delivering a sufficient supply of housing are also key policy drivers.
- 4.20 In making efficient use of land account should be taken of the identified need for different types of housing, local market conditions and viability and the desirability of maintaining an areas prevailing character.

- 4.21 “Community facilities”, as noted in the NPPF (para 98 a)), does not specifically refer to “schools” although the advice might be generally applied if pre-schools are considered as “other local services”. However, this is not the intention as the specific text that follows encourages positive planning in respect of community services but more specifically in paragraph 100 notes that it is important to provide a sufficient choice of early years and school places to meet the needs of the community.

5 Planning Considerations

- 5.1 The ground floor flat that had existed in 6 Gordon Road since the 1950s was put forward as an alternative to the refusal of permission to convert the garden flat in 2012 and permission was granted. The specific “Montessori” school relocated from 2 York Gardens in Clifton (BS8 4LL) and opened that year providing specific early years schooling for pupils ages 2-4 up until the owner’s (Principal’s) retirement in summer 2024. The permission was specific to the type of pre-school proposed (a relocation) and was conditionally limited to no more than 24 children; a limit between the hours of 08:30 – 16:00 Monday to Saturday and for only 38 weeks of the year. The use has operated within these restrictions since opening.
- 5.2 More recently, the “private” pre-school sector (and nursery sector so far as that is material) has been under financial pressure. This is largely (although not exclusively) related to the restriction of income or the fees that the school can charge contrasted with the rising costs of staffing and other costs. The number of pupils and timeframes at the site are in any event specifically restricted and the school cannot physically expand within the confines of the site and building footprint.
- 5.3 The school has consequently had to “run down” over the last 2 years or so and last year there were only 15 pupils over only 4 days a week. The owner / Principal’s retirement in summer 2024 was however preceded by investigations around financial viability and the potential sale or transfer of the business (on site or as a relocation) including to the two (job share) managers. Advice was taken and suggestions were made around reducing staff numbers or costs; increasing occupancy; increasing operating hours; moving to an all year round model and physical expansion (to other floors) or as an alternative “selling” the goodwill to another local Montessori provider. None of the existing site / use options were feasible, financially viable or practical within the planning, physical and heritage context of the site; the imposed planning conditions or without impacting the quality of service through e.g. reduced staff wages or less staff. The simple and practical option to preserve both the use and importantly the quality of the use was to utilise and transfer the goodwill and indeed the existing job share managers relocated the “Montessori” use, as Hotwells Children’s House, to within and as a part of Hotwells Primary School, approximately 1km to the south west.
- 5.4 The school via the Montessori method provided a specific style of early years education and attracted a range of clients not just from the immediate area. In this respect the provision of this service to the specific customer base has not been lost, just as the York Gardens use was not lost, and has simply relocated and the service for those that want it is still available at the Hotwells Children’s House. Notwithstanding this there is other early years education (and nursery provision) available generally in the local area, which include Clifton Tots (Richmond Hill and St Paul’s Road); Christ Church Clifton Pre School; Daisy Chain Nursery, Clifton Park; Clifton College, Mama Bears, Whiteladies Road; Bristol University Day Nursery and Clifton High School.

- 5.5 No.6 Gordon Road is owned by the applicant, who is the former school owner and Principal. The applicant lives in the main first and second floor maisonette and the garden flat is also owned by the family but is currently rented. While the pre-school use has been able to operate largely without inconvenience to the owning family or local residents (apart from occasional traffic/on street parking issues) the use cannot be realistically let to a third party or the property sold as it is, without inevitable residential amenity issues arising. This is compounded by both the conditional planning limitations around the existing use (and inevitably around alternative creche or day nursery or other E Class uses); the physical limitations of the property (and its listed status) and the financial viability of running what is a limited and restricted use.
- 5.6 The applicant wishes to sell the whole property (their longstanding family home) but, on the basis that the ground floor is neither practical or now financially viable as a separate and restricted pre-school, they have to secure the proposed change of use before that can happen. The property is being marketed by Richard Harding Estate Agents and advice and feedback so far has included that there is a need for housing and a strong demand in this highly sustainable and “walkable” area for period flats and that the extant lawful use and the physical size and “sandwiched” nature of that use is a significant restriction on the potential to secure another school or alternative Class F1 use.
- 5.7 In addition to the physical constraints of the site, in policy BCS12 / DM5 terms, the use is not “community land” or a “community building” in any event. Notwithstanding, supported by the applicant, the pre-school has relocated and not created a shortfall in the locality or any other harm to the provision of pre-school services. There is in simple terms other provision available in the locality, whether that be actually for specific early years education or more generally just for nursery facilities. On the basis of financial viability (and recognising the restrictive planning permission it operates under) and the listed status the building it is also no longer suitable for its current use or an alternative more intensive use. There is no longer a need to retain the use but “alternative provision” has been secured and other similar facilities are available in the locality. On this basis there is no conflict with policy BCS12 / DM5.
- 5.8 In emerging policy CF2 there is an additional element to criteria i), which also now seeks to look at whether the local community would be disadvantaged by any loss. The use is a specific early years school use serving a wide catchment for those that require this use rather than a more narrowly defined “local community” use but it has relocated and not been lost and no one is “disadvantaged”. On this basis there is also no policy conflict with emerging policy CF2 in the form it is currently drafted.
- 5.9 The application site is within Clifton Ward. The Ward Profile (data May 2024) unsurprisingly notes a significantly below Bristol average of households with dependent children, a significantly higher than Bristol Average percentages of 1 No. and 2 No. bed accommodation and a significantly higher percentage of flats and private owner rented accommodation. While any new build housing mix may be expected to address these characteristics so far as it may be possible to do so within the physical and conservation constraints of the Clifton Ward this is not relevant in this case where the existing use has relocated and a simple reversion to the previous use is requested. This must also be balanced in the context of the significant need for all forms of residential accommodation in the City.
- 5.10 The application site retains its previous flat layout and apart from the need for a new refurbished bathroom (within the existing room) no physical alterations are required. The

room sizes comply with (exceed) the Nationally described space standards and in this respect the proposal is compliant with policy BCS18 and more general guidance. The property is in a highly sustainable location but existing on site parking exists for at least three (and possibly four) cars and there is also existing bike parking and bin / recycling facilities.

Design and Access

- 5.11 As stated above no external or internal changes are proposed (or required) as the layout remained unaltered between the previously existing flat and the school use, including the existing kitchen. The proposed accommodation provides a good sized 2No. bed flat with reasonable outlook and private amenity space.
- 5.12 Pedestrian and vehicular access is provided to the site through an existing gated access direct from Gordon Road. However, while parking and vehicle turning is available on site via a large gravelled area parents dropping off their children to the pre-school did so from the existing frontage highway(s) causing some inconvenience to highway safety and existing local residents. The removal of this inconvenience is a small benefit to local highway safety / residential amenity.
- 5.13 On the site there are bike stands capable of accommodating 4No. bikes and a screened area behind the existing wall where existing refuse and recycling bins are stored. No changes are proposed and these facilities are adequate and safe to accommodate the needs associated with the total of three units that will result from the development.

Heritage

- 5.14 No alterations are proposed to the physical fabric of the existing building either internally or externally and as such Listed Building Consent is not required at this stage and the application in this respect has a neutral heritage impact. The prevention of ongoing vacancy, the removal of commercial traffic and on-street parking; the positive reversion of the ground floor back to its previous flat use and the associated decoration and ordinary property and garden maintenance that this involves are however positive enhancements of the heritage value of this listed building, its setting and the Conservation Area.

Sustainability, Energy and Waste

- 5.15 As a Listed Building does not have (or require) a recent EPC rating. The last EPC rating in 2011 was E with the potential to achieve D and this potential is assumed to have been achieved. This is a normal EPC rating for a listed period flat. It has modern gas central heating, good modern internal lighting and a well insulated floor and walls (largely introduced / required by the Council as part the school conversion for noise related reasons). The existing traditional sash and shuttered windows however remain single glazed and will be retained.
- 5.16 There are obvious socio-economic advantages to productive reuse (not vacancy), especially where there is a pressing need for residential accommodation. In addition, the site is located in a highly sustainable location with a range of community and service facilities available within easy cycle or walking distance or via public transport. As already stated, facilities for waste and cycle storage are currently provided in the garden to the front of the property screened by the existing roadside wall.
- 5.17 There is a single existing water butt and the potential to add an EV charger(s) into the parking area.

Ecology

- 5.18 As part of the school use three bird boxes exist on site and they will be retained. Otherwise, the site comprises simple managed garden. There is no known ecology interest in the site. The development, as a change of use only with no physical alterations, is exempt from Biodiversity Net Gain requirements.
- 5.19 The TPOd tree on the south eastern boundary is unaffected by the proposal.

CIL and Planning conditions

- 5.20 No CIL is payable in relation to the development proposed and this has been confirmed with the City Council. Other than the usual plans list conditions no other planning conditions are considered necessary, but such can be discussed if necessary.

6 CONCLUSIONS

- 6.1 This is a simple application to revert from the existing most recent pre-school use to the previously existing 2No. bed flat use. The previously existing pre-school could not be financially or practically retained but efforts were made in advance of closure and the “goodwill” (while not financially sold) was transferred to an alternative site no more than 1km to the south west. This site provides a real alternative for those who wish to pre-school their children at a Montessori facility. On this basis the existing use, so far as it may be described as a “community” use, has not been lost but merely relocated. Notwithstanding, even in this area where the population profile notes a significantly below Bristol average of households with dependent children, there are other pre-school facilities available locally to those in this area that require them. On the above basis there is no loss to the local community and thus no conflict with adopted policies BCS12/DM5 or emerging policy CF2.
- 6.2 With the planning and physical constraints of the site there is no practical or financially realistic alternative Class F1 use but some direct benefits associated with the removal of the related pre-school traffic and parking from surrounding roads; general heritage enhancements associated with re-use of a vacant building and importantly the delivery of a single good sized flat (much needed housing) into this highly sustainable area.
- 6.3 On balance the development has economic, social and environmental benefits and is policy compliant sustainable development.