

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

Our ref: PR002675

Date: 12<sup>th</sup> June 2025

**Sent via e-mail**

Dear Sir/Madam,

**Town and Country Planning Act 1990**

**7 Redcatch Road, Bristol BS4 2EP**

**Change of ground floor from Class E to 1no. residential flat, including removal of shopfront, partial demolition of rear extension, and erection of a ground floor rear extension**

I write on behalf of my clients, Amanda and Robert Clifford, to apply for the change of use of the ground floor retail unit to a self-contained flat, including the removal of the existing shopfront, and the erection of a rear extension following the partial demolition of an existing rear extension. The appellant has chosen to take the Section 62A route and submit the proposal directly to the Planning Inspectorate. Notice of this intention was given on the 23<sup>rd</sup> May 2025. I can confirm that the development would be liable for CIL. I attach the following documents as part of this application:

- Application forms and certificates;
- Drawing no. 868-101 – existing ground floor plan;
- Drawing no. 868-102 - existing first floor plan;
- Drawing no. 868-103 – existing elevations;
- Drawing no. 868-104 – existing sections;
- Drawing no. 868-105A – proposed ground floor plan;

- Drawing no. 868-106A – proposed first floor plan;
- Drawing no. 868-107A– proposed elevations;
- Drawing no. 868-108A – proposed sections;
- Drawing no. 868-109A – proposed sections;
- Drawing no. 868-110A – site location plan;
- Drawing no. 868-111A – proposed block plan;
- Energy statement;
- Heritage Impact Assessment;
- BNG exemption statement.

### **Site and planning history**

The site comprises a mid-terraced property on Redcatch Road, with a retail unit at ground floor level, and a residential flat at first floor level. There is access from the rear garden through to Ryde Road, via a service lane to the rear of the Broadwalk Shopping Centre. It forms part of a Victorian terrace (3-21 Redcatch Road) which branches off from the A37 Wells Road. Nos 3-11 comprise retail units at ground floor level (though no. 9 is currently vacant) with residential flats at first floor level. No 13 was converted to wholly residential under prior approval (ref: 21/06697/COU), and the shopfront replaced with domestic fenestration (planning permission 21/03891/F). The remainder of the terrace is wholly residential.

The site is secondary shopping frontage within the Wells Road/Broadwalk town centre, within Flood Zones 1, is not in a conservation area, there are no Tree Preservation Orders on the site, and the building is not listed.

There are inbound and outbound bus stops within a short distance (30-40 metres) to the east on Wells Road, with 10 services per hour towards the city centre, and through to the northern fringes of the city, and the same number of service per hour operating out towards the southern fringes of the city, and through to Bath, Wells and the wider Somerset area. As noted above, the site falls within the Broadwalk/Wells Road designated town centre, and has easy access to a wide range of services and facilities.

Planning permission was recently refused (22<sup>nd</sup> May 2025, ref: S62A/2025/0088) for a broadly similar scheme. The principle of development, including the loss of the retail unit, was accepted,

and no design concerns were raised. The two reasons for refusal related to uncertainty over rights of access to allow refuse, recycling and bikes to be carried through from the rear yard to Ryde Road, and inadequate natural light to habitable rooms, resulting in unacceptable living conditions for future occupants. A copy of this decision is appended to this letter.

## **Proposal**

My clients once more propose the change of use of the ground floor retail unit to a one-bed, self-contained flat. To facilitate the change of use, the existing shopfront would be replaced with new stone work and a new window.

The existing ground floor rear extension would be partially demolished, and replaced with an L-shaped extension built around the retained two-storey outrigger. This would comprise two elements; a small infill section to the side of the outrigger, with a mono-pitched roof and new velux rooflight, and a flat-roofed extension to the rear of the outrigger.

The dwelling would provide one bedspace and 64sqm of internal floorspace. Externally, refuse, recycling and secure cycle storage is proposed to the rear garden. The property has a right of access through to Ryde Road, via a service yard to the rear of the Broadwalk Shopping Centre.

## **Planning analysis**

### *Principle*

The site falls within the South Bristol Regeneration Area, and is covered by Policy BCS1, which states that higher densities and the efficient use of underused land will be encouraged within this area, as part of a housing requirement of 8,000 additional homes.

With regards to the loss of the retail unit, DM8 addresses applications within secondary shopping frontages, and notes that they support the overall function of the centres by allowing for a greater diversity of uses. The emphasis remains on active uses at ground floor level but the policy allows for further opportunities for development of uses such as cafés and financial services where they are complementary to the centre's role.

In assessing the previous application, the Inspector acknowledged that the proposal would conflict with DM8, but that in the context of the significant shortfall in housing delivery, this would carry limited weight, given the size of the unit relative to the centre, and its location on the edge

of secondary frontage, and that the loss of retail would not significantly harm the diversity of the centre.

### *Housing mix*

Policy BCS18 requires all new residential development to maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities; contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists; and respond to the requirements of a changing population.

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%.

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.

The 2021 Census data reports that, in the Knowle ward, 78.3% of dwellings were three bedroom or more, 11.3% two bedroom, and 10.4% one bedroom. This compares with city-wide figures of 55.4%, 28.4% and 16.2% respectively. The proposal would therefore contribute towards the identified need for smaller units suited for single people without exacerbating any local imbalance, and the aims of BCS18 would be met.

### *Design*

Policy BCS21 states that new development should contribute positively to an area's character and identity, whilst policy DM30 states that extensions will be expected to respect the siting, scale, form, proportions, materials, details and the overall design of the host building and broader streetscene. In a similar vein, policy DM26 requires development to respect the local pattern and characteristics, and to respond to the height, scale, massing, shape, form and proportions of

existing buildings. Finally, policy DM27 requires development to respect the layout and form of existing development.

The rear extensions are relatively low-key, not visible from the public realm, and typical of this style of property, and accordingly raise no concerns. With regards to the changes to the shopfront, the existing shopfront appears to be non-original, with an additional door having been inserted to create access to the first floor flat, and roller shutters having been installed. It is proposed to infill the shopfront with stone to match the first floor, and to provide two new entrance doors, with a new window centred between the doors. Both the window and the entrance doors would have Bath stone surrounds to match the first floor fenestration.

The previous Inspector was satisfied that the proposed works would enhance the setting of the nearby listed building (detailed within the accompanying HIA) through the re-introduction of more traditional materials and the removal of modern, unsympathetic alterations, and that the proposal would have an acceptable effect on the character and appearance of the area.

#### *Residential amenity of neighbours*

Both adjoining properties are in commercial use at ground floor level, and so there would be no impacts on residential amenity stemming from the proposed extensions. Notwithstanding, the flat-roofed extension would be on the same footprint as the existing buildings and so would not impact on the adjoining rear elevation window to 5 Redcatch Road on the horizontal axis. The proposal would result in additional height on the boundary, though the proposed flat roof would ensure that the extension would not breach the 45-degree line on the vertical axis.

#### *Amenity of future occupants*

In refusing the previous application, the Inspector raised issue with the levels of natural light to the living room and dining room, and lack of outlook from the living room (which was positioned to the rear of the building, and looked out on to the terrace). Light levels and outlook from the kitchen (to the front of the building) and bedroom were deemed to be acceptable.

To address this issue, the floor plan has been reconfigured, and a galley kitchen is now proposed to the middle of the building (which as a non-habitable room, for cooking purposes only, does not require natural light, though glazed doors and a partition are proposed through to the rear hallway which is served by the rear doors and a velux, and so the kitchen would achieve appropriate levels of natural light), with the living room and dining room relocated to the front of

the building, and served by the existing shopfront windows. The bedroom would remain in the same location as per the previous application.

#### *Sustainability and climate change*

Policy BCS14 requires proposals to demonstrate a 20% reduction in CO2 emissions from residual energy use, against a projected annual energy demand baseline based on the 2006 Building Regulations Part L standards. However, the Core Strategy is out-of-date, and the 2006 Part L standards have now been superseded by the 2021 edition including 2023 amendments. For existing buildings, Part L now requires improvements to the building's energy performance, such as upgrading insulation, installing more efficient heating systems, and reducing air leakage. Given the revised requirements and the status of the Core Strategy, it is therefore considered more appropriate for sustainability measures to be addressed at the Building Regulations stage.

Notwithstanding, the Energy Statement confirms that the development could achieve a 26% reduction in carbon dioxide emissions, through building fabric and the provision of an Air Source Heat Pump.

Notwithstanding, the previous inspector stated at §20 that, *"CS Policy BCS14 has been overtaken by the building regulations and this will provide a more appropriate route for addressing the energy performance of the building. "*

The applicant's preference would be to retain the existing heating system and to address sustainability measures through Building Regulations. Given the previous decision, the applicant requests that the energy statement therefore not form part of the approved plans, and that heating and energy be addressed through Building Regulations. However, should the Inspector for this scheme reach a different conclusion to their colleague, the energy statement meets the requirements of BCS14.

#### *Highway safety and parking*

The Council's Waste Guidance states that dwelling houses requires a refuse bin, two dry recycling boxes (44ltr & 55ltr), kitchen waste bin (29ltr) and cardboard sack (90ltrs). The rear garden would continue to be utilised for refuse and recycling storage, with a purpose-built store erected to

accommodate the requisite number of containers. The site has rear access through to Ryde Road, to allow containers to be taken out on to the road on collection days.

Secure and covered cycle storage for 2no. bicycles is proposed within the rear garden, exceeding the requirements of policy DM23. The dwelling would be within a town-centre location and easy walking distance of bus stops (less than 1 minutes' walk away), offering regular services into Bristol City Centre, the southern edges of the city, and beyond. As such, and given that the existing use would generate more vehicle movements (customers and staff) than a one-bed flat, the principle of a car-free development in this location can be supported.

The site has an existing access through to Ryde Road, as detailed in the accompanying Land Registry Title, and the red edge on the site location plan has been adjusted to incorporate this access, and certificate B served on the owners of the Broadwalk Shopping Centre. As such, the previous reason for refusal has been addressed.

*BNG*

The Environment Act 2021 introduces the mandatory "biodiversity net gain" (BNG) requirement for new housing and commercial development in England, subject to any exemptions that may apply. The exemptions that apply to the BNG requirements are habitats below a 'de minimis' threshold of 25 metres squared; or five metres for linear habitats like hedgerows.

As the proposed building works relate to the partial demolition and rebuilding within the existing footprint, the proposal would affect only sealed and developed surfaces, and no existing habitat, and would therefore be exempt from the BNG requirement. If the Inspector considers that the NPPF§187d requirement to provide net gains for biodiversity applies to the application site, then the provision of bird and/or bat boxes could be secured by condition.

### **Planning balance and conclusion**

In the context of the Council not meeting the most recent Housing Delivery Test, having a 2.2-2.4 year housing supply and paragraph 11d of the NPPF currently being engaged, the proposal offers: social benefits through the provision of additional housing in a sustainable location, in accordance with BCS1; economic benefits through construction jobs and increased spending in the locality; and environmental benefits through the more efficient use of land to provide increased accommodation, and the provision of an energy-efficient flat, converted to current Building Regulations standards.

The internal layout has been reconfigured to address previous concerns with regards to amenity and natural light, and the applicants have confirmed that they have a right of access through to Ryde Road, to allow bins and bikes to be taken out on to the highway.

The fee of £578 will be paid directly to the Planning Inspectorate on request. If you have any further queries, then please do not hesitate to contact me.

Yours faithfully,

**Stokes Morgan Planning Ltd**